

Circuit Court of Cook County, Illinois

NOTICE OF CLASS ACTION SETTLEMENT REGARDING IMPROPER  
FILING FEES IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

*The Court authorized this Notice. This is not a solicitation from a lawyer.*

**IF YOU PAID A FILING FEE FROM JULY 25, 2009 TO FEBRUARY 21, 2017 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS TO FILE A MOTION OR PETITION TO RECONSIDER, VACATE, OR MODIFY AN INTERLOCUTORY JUDGMENT OR ORDER OF COURT, THIS NOTICE CONTAINS IMPORTANT INFORMATION THAT PERTAINS TO YOU. PLEASE READ IT CAREFULLY. YOU MAY GET A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

<b>Your Legal Rights and Options with this Settlement</b>	
<b>Receive Your Share of the Settlement</b>	If you are a member of the Settlement Class, then you are eligible for a payment. You must submit a Claim Form as described in Question 10. Claim Forms must be submitted online or postmarked by the deadline of January 30, 2021.
<b>Exclude Yourself</b>	You have the option to exclude yourself, or “Opt Out” of this Settlement by following the directions in Question 14. If you do so, you will get no payment. This is the only option that allows you to be part of any other lawsuit against Defendants based on the allegations made in this case. The deadline for excluding yourself from the Settlement is January 15, 2021.
<b>Object</b>	Write to the Court about why you don’t like the Settlement by following the directions in Question 19. The deadline for submitting a written objection to the Settlement is January 15, 2021.
<b>Do Nothing</b>	If you do nothing, you will get no payment and be bound by the Final Approval Order approving the Settlement.
<b>Go to the Final Approval Hearing</b>	You are not required to attend or speak at the Final Approval Hearing. If you submit a timely and valid written objection to the Settlement, the Court will consider your objection without any further action on your part. But, if you wish, you may request permission to speak at the Final Approval Hearing by following the directions in Question 23. The Final Approval Hearing is currently scheduled for March 8, 2021.

- Defendants Dorothy Brown, as Clerk of the Circuit Court of Cook County, Illinois; and Cook County, Illinois (“Defendants”) have agreed to pay the amount of \$5,218,155 into a Settlement Fund from which Settlement Class Members who submit valid Claim Forms will be paid after subtracting reimbursement of Class Counsel’s Litigation Costs as awarded by the Court, Service Awards of up to \$10,000 to each of the Named Plaintiffs as awarded by the Court, attorneys’ fees as awarded by the Court to Class Counsel in an amount up to \$1,594,385 from the Settlement Fund, as set forth in the Settlement Agreement, up to \$625,000 for attorneys’ fees and costs to the plaintiff’s counsel in the related Gassman Action, as awarded by the Court, and Notice Costs and Administration Costs of the Settlement Administrator. Defendants have agreed to pay the amount of \$5,218,155 into a Settlement Fund to settle all claims alleged against them in the following class action lawsuits: *Midwest Medical Records Association, Inc. v. Dorothy Brown, et al.*, Case No. 15 CH 16986; *RenX Group, LLC v. Dorothy Brown, et al.*, Case No. 15 CH 18832; *Tomica Premovic v. Dorothy Brown, et al.*, Case No. 16 CH 193; and *Clark v. Dorothy Brown, et al.*, Case No. 17 CH 12573, each of which was filed in the Circuit Court of Cook County, Illinois (the “Actions”). The proposed settlement (“the Settlement”) is a compromise of all claims by Plaintiffs in the Actions including claims for unjust enrichment and violation of an Illinois statute regarding court filing fees. The Settlement will resolve all claims regarding Defendants’ charging of filing fees from July 25, 2009 to February 21, 2017 for motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court, including any allegations contained in any of the Complaints in the Actions and/or any facts or circumstances that could have been alleged.
- A putative class action was also filed against Defendants in *Gassman v. Dorothy Brown, et al.*, Case No. 14 CH 12269 (“Gassman Action”). The Gassman Action raises the same legal issues raised in the four class action lawsuits giving rise to this Settlement. To settle the Gassman Action in conjunction with this Settlement, pursuant to a separate settlement (“Gassman Settlement”), Defendants are paying the plaintiff’s counsel in the Gassman Action (“Gassman counsel”) their attorneys’ fees and costs up to the amount of \$625,000, as awarded by the Court, out of the Settlement Fund in this Settlement.
- Settlement Class Members are those individuals and entities who paid a fee for the filing of a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in the Circuit Court of Cook County, Illinois from July 25, 2009 to February 21, 2017 (the “Class Period”).
- The Settlement avoids the costs and risks from continuing the Actions, pays money to the individuals and entities who are part of the Settlement Class, and releases Defendants from further liability as to them.

- **Your legal rights are affected whether you act or don't act.** Please read this Notice carefully.
- Your rights and options—**and the procedures and your deadlines to exercise them**—are explained in more detail below. Please note, however, that this Notice is only a summary of the proposed Settlement. For the complete terms and conditions of the proposed Settlement, you should read the document called the Settlement Agreement, which was filed with the Court and is available from the Settlement Webpage [www.CookCountyCourtFeeSettlement.com](http://www.CookCountyCourtFeeSettlement.com).
- The Court in charge of this case still must decide whether to approve the proposed Settlement. Payments will not be made until the Court approves the Settlement and any appeals are resolved. Please be patient.

**WHAT THIS NOTICE CONTAINS**

**BASIC INFORMATION** ..... **PAGE 3**

1. Why did I get this notice?
2. What is the lawsuit about?
3. Why is this a class action?
4. Why is there a Settlement?

**WHO IS IN THE SETTLEMENT** ..... **PAGE 3**

5. How do I know if I am part of the Settlement?
6. Are there exceptions to being included?
7. What if I am still not sure if I am included?

**THE SETTLEMENT BENEFITS—WHAT YOU GET** ..... **PAGE 4**

8. What does the Settlement provide?
9. How much will my payment be?

**HOW YOU GET A PAYMENT—PARTICIPATING IN THE SETTLEMENT** ..... **PAGE 5**

10. Do I have to do anything to get a payment?
11. What if the information on my Letter Notice or Electronic-Mail Notice is incorrect?
12. When will I get my payment?
13. What am I giving up to get a payment or stay in the Settlement Class?

**EXCLUDING YOURSELF FROM THE SETTLEMENT** ..... **PAGE 6**

14. How do I get out of the Settlement?
15. If I don't exclude myself, can I sue these Defendants for the same thing later?
16. If I exclude myself, can I get money from this Settlement?

**THE LAWYERS REPRESENTING YOU** ..... **PAGE 6**

17. Do I have a lawyer in the case?
18. How will the lawyers be paid?

**OBJECTING TO THE SETTLEMENT** ..... **PAGE 7**

19. How do I tell the Court that I don't like the Settlement?
20. What's the difference between objecting and excluding?

**THE COURT'S FINAL APPROVAL HEARING** ..... **PAGE 7**

21. When and where will the Court decide whether to approve the Settlement?
22. Do I have to come to the hearing?
23. Can I speak at the hearing?

**IF YOU DO NOTHING** ..... **PAGE 8**

24. What happens if I do nothing at all?

**GETTING MORE INFORMATION** ..... **PAGE 8**

25. Are there more details about the Settlement?
26. How do I get more information?

## BASIC INFORMATION

### 1. Why did I get this notice?

If you received a notice, it is because Defendants' records show that you paid a fee to file a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in the Circuit Court of Cook County, Illinois from July 25, 2009 to February 21, 2017. As such, you are a Settlement Class Member and are eligible to receive monetary compensation from the Settlement Fund.

The Court required that notice be issued because potential Class Members have a right to know about a proposed Settlement of certain class action lawsuits, and about all their legal options, before the Court decides whether to approve the Settlement. The Court has preliminarily approved the Settlement. If the Court gives the Settlement its final approval, and after any objections and appeals are resolved, Defendants will make the payments that the Settlement allows. Please check the Settlement Webpage for updates on the status of the Settlement. This Notice explains the lawsuits, the Settlement, the legal rights of Class Members, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the settlement approval process is the Circuit Court of Cook County, Illinois, Hon. Raymond W. Mitchell (the court in which the Actions are pending).

Midwest Medical Records Association, Inc., RenX Group, LLC, Tomica Premovic, and Julie Clark, who sued Defendants in the Actions, are called the "Plaintiffs" or the "Class Representatives."

### 2. What is the lawsuit about?

Plaintiffs brought the Actions on behalf of everyone who paid a fee to file a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in the Circuit Court of Cook County, Illinois. Plaintiffs maintain that Defendants violated the Illinois Clerk of Courts Act, 705 ILCS 105/0.01, *et seq.*, by charging these filing fees because the Clerk of Courts Act authorizes Defendants to charge a fee for the filing of a motion or petition to reconsider, vacate, or modify only a *final* judgment or order of court, not an *interlocutory* judgment or order of court.

### 3. Why is this a class action?

In a class action, one or more people called Plaintiffs sue on behalf of people who have similar claims. The Plaintiffs seek to have a single court resolve the issues for all members of the class, except for those who wish to exclude themselves from the class, and Plaintiffs seek appointment as the Class Representatives to represent the interests of class members.

### 4. Why is there a Settlement?

The Court did not decide in favor of either Plaintiffs or Defendants. Rather than continue with the court proceedings, the Parties agreed to the Settlement. Before entering into the Settlement, the lawyers for the Plaintiffs in the Actions ("Class Counsel") conducted an extensive investigation of the facts, and after conducting their extensive investigation, Class Counsel analyzed the significant risks associated with the continued litigation of the Actions, including risks relating to: (a) prevailing on class certification; (b) overcoming Defendants' defenses; and (c) calculating class-wide damages. Based on all these considerations and others, Class Counsel and the Class Representatives think the Settlement is best for all Settlement Class Members.

## WHO IS IN THE SETTLEMENT

To see if you will get money from this Settlement, you first must determine if you are a Settlement Class Member.

### 5. How do I know if I am part of the Settlement?

The Settlement Class is composed of all individuals and entities who paid a fee to file a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in the Circuit Court of Cook County, Illinois from July 25, 2009 to February 21, 2017.

If you received an Electronic-Mail Notice or Letter Notice of this Settlement, then Defendants' records show that you paid such a filing fee during the Class Period. Thus, if you received an Electronic-Mail Notice or Letter Notice of this Settlement, then Defendants' records indicate that you are a Settlement Class Member.

### 6. Are there exceptions to being included?

Yes. Even if you fall within the Settlement Class as described in Question 5, you are not a Settlement Class Member if you are: (1) a current or former employee, officer or director of Defendants or their agents, subsidiaries, parents, successors, predecessors, or any entity in which they or their parents have a controlling interest; (2) the judge to whom this case is assigned or part of the judge's immediate family; (3) a person who executes and submits a timely request for exclusion from the Class;

(4) a person who has had his/her claims in any of the Actions finally adjudicated and/or otherwise released; and (5) the legal representative, successor or assign of any such excluded person.

The Settlement Class also does not include any individuals or entities who received a waiver or refund for any such filing fee. These individuals and entities are not part of the Settlement Class, and any rights they may have are not affected or released by this Settlement.

#### **7. What if I am still not sure if I am included?**

If you are still not sure whether you are included, you can ask for free help. You can visit [www.CookCountyCourtFeeSettlement.com](http://www.CookCountyCourtFeeSettlement.com) for more information, or you can call the Settlement Administrator at 1-866-246-3316.

### **THE SETTLEMENT BENEFITS—WHAT YOU GET**

#### **8. What does the Settlement provide?**

Defendants have agreed to pay a total of \$5,218,155 into a Settlement Fund. After subtracting Class Counsel's attorneys' fees awarded by the Court, reimbursement to Class Counsel for their out-of-pocket expenses already paid in prosecution of the Actions, service awards for the Class Representatives, attorneys' fees and costs to Gassman counsel as awarded by the Court, and the Notice Costs and Administration Costs of the Settlement Administrator, the remaining money in the Settlement Fund (the "Net Settlement Fund") shall be distributed to Settlement Class Members by refunding all Settlement Class Members the amount of \$67.50 for each of the filing fees they paid or their *pro rata* share of the Net Settlement Fund to file motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court during the Class Period. For more information on exactly how the Settlement Amount will be allocated, please read the full Settlement Agreement, which is available on the Settlement Webpage at [www.CookCountyCourtFeeSettlement.com](http://www.CookCountyCourtFeeSettlement.com).

Also as part of the Settlement, The Clerk of the Court will continue to provide a mechanism by which the filer identifies whether the judgment/order sought to be vacated/reconsidered/modified is an interlocutory or final judgment/order and, based upon the filer's identification, the Clerk of Court will not charge a Filing Fee for the filing of a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court. The Clerk of Court may seek Court approval to modify this policy.

**If you are a Class Member and you want to receive a payment pursuant to the Settlement, you must submit a Claim Form.** Each Class Member will be sent a customized Notice identifying the cases in which they paid filing fees during the Class Period as shown in Defendants' records. If you agree that the filing fee information listed in your customized Notice correctly reflects all of the cases in which you paid a fee to file a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in Cook County, Illinois from July 25, 2009 to February 21, 2017, then submit the online Claim Form or download a Claim Form and mail it to the address set forth therein postmarked on or before **January 30, 2021**.

If you believe you are a Class Member and did not receive such Notice, or if you believe that your Notice contains inaccurate or incomplete information about the filing fees you paid, then you may submit a Claim Form with supporting documentation showing the fees you paid to file a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court from July 25, 2009 to February 21, 2017. If you wish to submit a Claim Form, you must do so on or before **January 30, 2021**. You can download a blank Claim Form from the Settlement Webpage and submit it by mail, or you can submit your Claim Form online. Other detailed information about the Settlement and the claim submission process is posted on the Settlement Webpage and can also be obtained by calling the number below.

The Court must approve the amount of attorneys' fees, litigation costs, and service awards given to Class Counsel, Gassman counsel, and the Class Representatives, and the awarded amounts will be paid from the Settlement Fund. The Settlement authorizes Class Counsel to seek an award of attorneys' fees of up to \$1,594,385 from the Settlement Fund. The Settlement also authorizes Class Counsel to seek reimbursement for all court costs and other litigation expenses they paid out of pocket in prosecution of the Actions, and service awards of up to \$10,000 to each of the Class Representatives for their efforts in undertaking the litigation and assisting Class Counsel with the prosecution of the Actions. The Settlement also provides that Gassman counsel can seek an award of attorneys' fees and costs of up to \$625,000 from the Settlement Fund.

#### **9. How much will my payment be?**

After subtracting Class Counsel's attorneys' fees up to \$1,594,385 as awarded by the Court from the Settlement Fund, reimbursement to Class Counsel for their out-of-pocket expenses already paid in prosecution of the Actions, service awards up to \$10,000 for each of the Class Representatives, Gassman counsel's attorneys' fees and costs of up to \$625,000 as awarded by the Court, and the payment of Notice Costs and Administration Costs of the Settlement Administrator, the remaining money in the Settlement Fund (the "Net Settlement Fund") shall be distributed to Settlement Class Members pursuant to a plan of allocation to be approved by the Court.

Each Settlement Class Member will receive a refund of \$67.50 (in the event a Settlement Class Member provides a receipt or other documentation showing that more than \$67.50 was paid to the Clerk of Court for the filing of a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court in the Circuit Court of Cook County during the Class Period, the Third-Party Settlement Administrator, upon reviewing and accepting the Class Member's documentation, will reimburse the Class Member at the level evidenced by the documentation) for each fee that they paid, or the *pro rata* amount in the event that the approved amounts exceed the Net Settlement Fund, to file during the Class Period motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court in the Circuit Court of Cook County, Illinois.

Each Settlement Class Member will be sent an Electronic-Mail Notice and/or a Letter Notice informing them that they are a Settlement Class Member and explaining the nature of the Actions. Each Settlement Class Member's Notice will state that Defendants' records show they paid fees to file motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court in the Circuit Court of Cook County, Illinois during the Class Period, as well as the date(s) on which the fees were paid and the name(s) and number(s) of the cases in which the fees were paid. If any Settlement Class Member believes the information stated in their Notice is incomplete or incorrect, or if a person or entity believes they are a Settlement Class Member but did not receive Notice, then they may submit a Claim Form with supporting documentation to support their claimed amount of fees paid. See Questions 8, 10, and 11.

Settlement Class Members who do nothing will get no payment and be bound by the Final Approval Order approving the Settlement.

#### HOW YOU GET A PAYMENT—PARTICIPATING IN THE SETTLEMENT

##### 10. Do I have to do anything to get a payment?

Yes. To receive a payment, you must submit a Claim Form.

**If you do nothing, then you will get no payment and be bound by the Final Approval Order approving the Settlement.**

If you submit a timely request for exclusion, then you will not receive any money from the Settlement.

If you believe that any of the information stated in your Letter Notice or Electronic-Mail Notice is incomplete or incorrect, or if you believe you are a Settlement Class Member but did not receive Notice, then you may submit a Claim Form as provided in Question 11.

##### 11. What if the information on my Letter Notice or Electronic-Mail Notice is incorrect?

If you believe that your Letter Notice or Electronic-Mail Notice contains inaccurate or incomplete information about the fees you paid to file motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court in the Circuit Court of Cook County, Illinois during the Class Period, the date(s) on which you paid these fees, or the case(s) in which you paid these fees, then you may submit a Claim Form to dispute this information and tell the Settlement Administrator the correct amount of fees that you believe you paid.

A downloadable Claim Form can be found on the Settlement Webpage, or you can submit your Claim Form online. **You must submit additional documentation with your Claim Form to support your claim.** The deadline to submit your Claim Form and supporting documentation is **January 30, 2021**.

The Settlement Administrator will review your Claim Form and supporting documentation and determine whether the information that you provided is accurate. If the Settlement Administrator verifies that some or all of the information you submitted is accurate, then your award under the Settlement will be recalculated in accordance with the Settlement Agreement.

However, if the Settlement Administrator determines that the information stated in your Claim Form is inaccurate or unsupported by sufficient documentation, then the Settlement Administrator will provide your Claim Form and supporting documentation to Class Counsel and Defense Counsel to review. If Class Counsel agrees with you, Class Counsel may file a motion with the Court and the Court will determine whether your Claim Form is valid. If Class Counsel agrees with the Settlement Administrator's determination, or if Class Counsel files a motion with the Court and the Court agrees with the Settlement Administrator, then your share of the Net Settlement Fund will be calculated using only the information deemed valid.

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

The Court will hold a hearing on **March 8, 2021, at 11:00 a.m.** to decide whether to approve the Settlement. If the Court approves the Settlement, there may be one or more appeals. It's always uncertain whether these appeals can be resolved, and resolving them may take time, often more than a year. Once any and all appeals are resolved, the Settlement Administrator can issue checks to Settlement Class Members.

**13. What am I giving up to get a payment or stay in the Settlement Class?**

Unless you exclude yourself, you will stay in the Settlement Class, and all of the Court’s orders will apply to you and legally bind you. That means that you cannot sue, continue to sue, or be part of any other lawsuit against Defendants about charging fees to file motions or petitions to reconsider, vacate, or modify interlocutory judgments or orders of court during the Class Period. If you stay in the Settlement Class, you on behalf of yourself, and your present or former agents, employees, owners, shareholders, principals, officers, directors, attorneys, heirs, representatives, family members, executors, administrators, assignees, predecessors and/or successors in interest, parent companies, subsidiaries, affiliates, and related companies, will fully, finally, and forever release and forever discharge Defendants, and their present or former agents, employees, owners, shareholders, principals, officers, directors, attorneys, heirs, representatives, family members, executors, administrators, assignees, predecessors and/or successors in interest, parent companies, subsidiaries, affiliates, related companies, and insurers (“Released Parties”), of and from any and all direct, individual, or class claims, rights or causes of action or liabilities whatsoever, whether known or unknown, whether accrued or unaccrued, and whether arising under federal, state, local, statutory, common or any other law, rule, or regulation that arise out of and are based on the factual predicate underlying the claims in the Actions during the Class Period (the “Released Claims”).

**EXCLUDING YOURSELF FROM THE SETTLEMENT**

**14. How do I get out of the Settlement?**

To exclude yourself from the Settlement, you must send a letter by mail stating that you want to be excluded from the Settlement. Your request for exclusion must include all of the following:

- (a) Your name and address;
- (b) Your physical signature;
- (c) The name and number of the ‘Primary Action’ or ‘Actions’ “*Midwest Medical Records Association, Inc. v. Dorothy Brown, et al.*, Case No. 15 CH 16986”; and
- (d) A statement that you wish to be excluded from the Settlement Class.

You must mail your request for exclusion postmarked no later than **January 15, 2021** to:

Cook County Court Fee Settlement Administrator  
P.O. Box 43501  
Providence, RI 02940-3501

If you ask to be excluded, you will not get any Settlement payment, you cannot object to the Settlement, and you cannot ask to speak at the Final Approval Hearing. You will not be legally bound by anything that happens in the Actions. Depending upon the applicable statute of limitations, you may be able to pursue a claim (or continue to pursue a claim) against Defendants on your own regarding the issues raised in the Actions.

**15. If I don’t exclude myself, can I sue these Defendants for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue any of the Defendants for the claims that this Settlement resolves. If you have a pending lawsuit against Defendants (or any of its related parties as described in answer to Question 13 above), speak to your lawyer in that case immediately. You may have to exclude yourself from the Settlement Class to continue your own lawsuit against Defendants or any of their related parties. Remember, the exclusion deadline is **January 15, 2021**.

**16. If I exclude myself, can I get money from this Settlement?**

No. If you exclude yourself, you will not receive any money from the Settlement. But, you are free to sue, continue to sue, or be part of a different lawsuit against any Defendant about the issues in the Actions.

**THE LAWYERS REPRESENTING YOU**

**17. Do I have a lawyer in the case?**

The Court has appointed Thomas A. Zimmerman Jr. of Zimmerman Law Offices, P.C., Larry D. Drury of Larry D. Drury, Ltd., and Myron M. Cherry and Jacie C. Zolna of Myron M. Cherry & Associates, LLC as Class Counsel for the Settlement Class (“Class Counsel”). You will not be separately charged for their services. If you want to be represented by your own lawyer, you may hire one at your own expense.

**18. How will the lawyers be paid?**

Class Counsel will ask the Court to approve payment of attorneys’ fees in an amount not to exceed \$1,594,385, plus reimbursement of their out-of-pocket Litigation Costs. The attorneys’ fees would pay Class Counsel for investigating the facts, litigating the case and negotiating the Settlement. The Court may award less than the amounts requested. The amounts paid for attorneys’ fees and to reimburse Class Counsel for their out-of-pocket Litigation Costs will be paid out of the Settlement Fund and will reduce the amount available to Settlement Class Members.

**OBJECTING TO THE SETTLEMENT**

You can tell the Court that you don’t agree with the Settlement or some part of it.

**19. How do I tell the Court that I don’t like the Settlement?**

If you are a Settlement Class Member, you can object to the Settlement if you don’t like any part of it and tell the Court why you feel the Settlement should not be approved. The Court will consider your views. To object, you must mail and file a document with the Court stating that you object to the Settlement. Your objection must include:

- Case name (“*Midwest Medical Records Association, Inc. v. Dorothy Brown, et al.*”);
- Case number (Case No. 2015 CH 16986);
- Your name and address;
- Your physical signature;
- A statement that you are a Settlement Class Member;
- The case caption and court number of a case in which you filed a motion or petition to reconsider, vacate, or modify an interlocutory judgment or order of court from July 25, 2009 to February 21, 2017;
- Documentary proof that you paid a fee to the Clerk of Court for the filing of such motion or petition;
- A statement that such fee was not waived or refunded;
- The reasons that you object to the proposed Settlement, along with any supporting documents; and
- A statement indicating whether you intend to appear at the Final Approval Hearing with or without counsel.

In addition to you filing your objection with the Court at the address below no later than **January 15, 2021**, the objection must also be mailed to Class Counsel and Defendants’ Counsel at the following addresses, postmarked no later than **January 15, 2021**:

COURT	CLASS COUNSEL	DEFENDANTS’ COUNSEL
Clerk of the Court Circuit Court of Cook County, Illinois Richard J. Daley Center, Room 802 50 West Washington St. Chicago, IL 60602	Thomas A. Zimmerman Jr. Zimmerman Law Offices, P.C. 77 W. Washington St., Suite 1220 Chicago, IL 60602	Marie D. Spicuzza Assistant State’s Attorney Attn.: Interlocutory Fee Settlement 50 West Washington St. Chicago, IL 60602

**20. What’s the difference between objecting and excluding?**

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

**THE COURT’S FINAL APPROVAL HEARING**

The Court has preliminarily approved the Settlement. The Court will hold a Final Approval Hearing to decide whether to give final approval to the Settlement. Although you don’t have to, you may attend and, if you filed a timely, written objection, you can ask to speak at the hearing.

**21. 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 March 8, 2021** at the Circuit Court of Cook County, Illinois, Richard J. Daley Center, 50 West Washington Street, Courtroom 2601, Chicago, Illinois 60602. At this hearing, the Court will consider whether the Settlement with Defendants is fair, reasonable, adequate and in the best interests of the Settlement Class. The Court will also consider whether to approve the proposed plan of allocation of the Settlement proceeds to the Settlement Class. The Court will also consider: (a) the application by Class Counsel for payment of attorneys' fees out of the Settlement Fund created through their efforts; (b) reimbursement of Class Counsel's Litigation Costs; (c) the application for the payment of service awards to the Class Representatives; and (d) the application by Gassman counsel for payment of their attorneys' fees and costs.

If there are any timely objections to the Settlement, the Court will consider them. The Court may listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement and how much to pay Class Counsel, Gassman counsel, and the Plaintiffs. We do not know how long these decisions will take.

The Final Approval Hearing may be continued or adjourned by the Court without further notice to the Settlement Class. Settlement Class Members who may attend the Final Approval Hearing can check the Settlement Webpage for updates. Due to Covid-19, the final approval hearing may be conducted via remote means. If so, information on how to attend the hearing remotely will be posted at <http://www.CookCountyCourtFeeSettlement.com>.

**22. Do I have to come to the hearing?**

No. Class Counsel will answer questions the Court may have. But you are welcome to attend at your own expense. If you send an objection, you don't have to come to the hearing to talk about it. As long as you mailed your written objection on time, the Court will consider it. If you hired your own lawyer, you may have to pay your own lawyer to attend, but it's not necessary that he or she do so.

**23. Can I speak at the hearing?**

You cannot speak at the hearing if you excluded yourself from the Settlement. If you filed a timely, written objection, you (or your own lawyer) may appear and speak at the Final Approval Hearing, if the Court permits it, but, to do so, a notice of your intention to appear must be filed with the Court.

**IF YOU DO NOTHING**

**24. What happens if I do nothing at all?**

If you do nothing, you will not receive any payment pursuant to the Settlement and you will also be bound by the Final Approval Order approving the Settlement and cannot start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants about the issues in the Actions.

**GETTING MORE INFORMATION**

**25. Are there more details about the Settlement?**

This Notice summarizes the proposed Settlement. More details are available in the Settlement Agreement. If you wish to review the Settlement Agreement, you may do so by visiting [www.CookCountyCourtFeeSettlement.com](http://www.CookCountyCourtFeeSettlement.com).

**26. How do I get more information?**

You can call toll-free 1-866-246-3316 or visit the Settlement Webpage at [www.CookCountyCourtFeeSettlement.com](http://www.CookCountyCourtFeeSettlement.com), where you will find answers to common questions about the Settlement, plus other information to help you determine whether you are a member of the Settlement Class and whether you are eligible for payment. The most important documents in this case can be viewed, free of charge, on the Settlement Webpage.

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANTS WITH QUESTIONS ABOUT THE SETTLEMENT.**