

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Karling v. Samsara Inc., Case No. 2025-LA-0000175
(Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois)

For more information, visit www.dashcamsettlement.com.

PLEASE READ THIS NOTICE CAREFULLY. YOU MAY BE ENTITLED TO A CASH PAYMENT AND OTHER RELIEF FROM A CLASS ACTION SETTLEMENT IF:

- **YOU OPERATED A VEHICLE IN ILLINOIS THAT WAS EQUIPPED WITH A SAMSARA DASH CAMERA BETWEEN DECEMBER 16, 2016 AND JUNE 12, 2025**

OR

- **YOU ARE AN ILLINOIS RESIDENT WHO OPERATED SUCH A VEHICLE OUTSIDE ILLINOIS DURING THAT TIME PERIOD**

A State Court authorized this Notice of a proposed class action Settlement. This is not a solicitation from a lawyer and is not notice of a lawsuit against you.

WHY DID I GET THIS NOTICE?

- A Settlement has been reached in a class action lawsuit against Samsara Inc. (“Samsara” or “Defendant”), which provided customers with dual-facing dashboard cameras (“Dash Cams”) and the ability to enable a feature known as “Camera ID.”
- The case is *Karling v. Samsara Inc.*, Case No. 2025-LA-0000175, currently pending in the Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois.
- The lawsuit alleges that through the operation of the Dash Cams, including the Camera ID feature, Samsara violated an Illinois law called the Illinois Biometric Information Privacy Act (“BIPA”) by allegedly collecting, storing, using, and disclosing individuals’ biometric data without complying with the law’s requirements.
- The proposed Settlement is not an admission of wrongdoing by Samsara. Samsara denies that it violated the law. The Court has not decided who is right or wrong. Rather, to avoid the time, expense, and uncertainty of litigation, the Parties have agreed to settle the lawsuit. The Settlement has been preliminarily approved by a court in Winnebago County, Illinois.
- You are included in the Settlement if (a) you operated a vehicle between December 16, 2016 and June 12, 2025 within the State of Illinois that was equipped with a dual-facing Samsara Dash Cam; or (b) you are an Illinois resident not included in (a) who operated a vehicle between December 16, 2016 and June 12, 2025 outside Illinois that was equipped with a dual-facing Samsara Dash Cam.

By Order of: Hon. Ronald Barch, Circuit Court of the 17th Judicial Circuit, Winnebago County, Illinois
Page 1 of 10

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- If the Court approves the Settlement, members of the Settlement Class who submit Approved Claims will receive an equal, or *pro rata*, share of a \$3,950,000 Settlement Fund that Samsara has agreed to establish, after deduction of the attorneys' Fee Award, an Incentive Award, Settlement Administration Expenses, and the costs of the privacy protection benefit. Also, if the Court approves the Settlement, members of the Settlement Class will also be eligible to enroll in one (1) free year of Privacy Shield, a service designed to promote privacy and anonymity. Privacy Shield is being made available to promote privacy consistent with BIPA and not because of any concerns about the security or disclosure of data collected by Samsara Dash Cams. The Postcard Notice provided directly to Settlement Class Members includes an enrollment code allowing Settlement Class Members to automatically enroll with Privacy Shield following judicial approval of the Settlement.
- The amount of the settlement payments is unknown and will depend upon the number of valid Claim Forms submitted.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
SUBMIT A CLAIM FORM	This is the only way to receive a Settlement Payment and, if you did not receive a Postcard Notice, the only way to receive the Privacy Protection Benefit.	Postmarked or submitted online by Monday, September 29, 2025
EXCLUDE YOURSELF	You will receive no payment, but you will retain any rights you currently have to sue Samsara or the other Released Parties about the issues in this case. (You may not exclude yourself and also submit a claim form).	Postmarked or received by Monday, September 8, 2025
OBJECT	File a written objection with the Court explaining why you don't like the Settlement. You also must email a copy of your objection to Class Counsel and Samsara's counsel. (You may object and also submit a Claim Form).	Filed by Monday, September 8, 2025
ATTEND THE HEARING	If you file a written objection, you may also ask to speak in Court about the fairness of the Settlement.	The Court will hold the hearing at 2:00 pm CT on October 16, 2025

<p>DO NOTHING</p>	<p>You will receive no payment under the Settlement and give up your rights to sue Samsara or the other Released Parties about the issues in this case.</p>	<p>N/A</p>
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These rights and options—and the deadlines to exercise them—are explained in this Notice.

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

BASIC INFORMATION

WHAT IS THIS LAWSUIT ABOUT?

The Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS § 14/1, *et seq.*, prohibits private companies from collecting, capturing, obtaining, or possessing the biometric identifiers and/or information of an individual without complying with the requirements of the statute. The lawsuit alleges Samsara violated BIPA by allegedly collecting, capturing, obtaining, using, storing, and disclosing individuals’ biometric data when its customers use Samsara Dash Cams, without complying with the statute. Samsara contests these claims and denies that it violated BIPA or committed any other wrongdoing and denies that Plaintiff or the putative class members are entitled to recover anything from Samsara.

More information about the lawsuit can be found in the “Court Documents” section of the Settlement Website at **www.dashcamsettlement.com**.

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 “Settlement Class” or “Settlement Class Members.” Once a Settlement 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.

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 in the case against Defendant and the other Released Parties. The Settlement requires Defendant to pay money to the Settlement Class, as well as pay settlement administration expenses, the cost of providing other settlement benefits, attorneys’ fees and costs to Class Counsel, and an incentive 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.

By Order of: Hon. Ronald Barch, Circuit Court of the 17th Judicial Circuit, Winnebago County, Illinois
Page 3 of 10

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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 preliminarily 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 enter a Final Approval Order approving the Settlement, or if the Settlement Agreement 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 CLASS?

You are a member of the Settlement Class if (a) you operated a vehicle between December 16, 2016 and June 12, 2025 within the State of Illinois that was equipped with a dual-facing Samsara Dash Cam; or (b) you are an Illinois resident not included in (a) who operated a vehicle between December 16, 2016 and June 12, 2025 outside Illinois that was equipped with a dual-facing Samsara Dash Cam.

Excluded from the Settlement Class are: (1) any Judge or Magistrate presiding over the Federal Action or the State Action and members of their families, (2) the Defendant, Defendant's subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parent has a controlling interest, (3) persons who properly execute and file a timely request for exclusion from the Settlement Class, and (4) the legal representatives, successors or assigns of any such excluded persons.

THE SETTLEMENT BENEFITS

WHAT DOES THE SETTLEMENT PROVIDE?

Cash Payments. If you're eligible, you can file a claim to receive a Settlement Payment. The amount of such payment is currently unknown and will depend upon the number of valid Claim Forms submitted. This would be an equal share of a \$3,950,000 fund that Samsara has agreed to create, after the payment of settlement expenses, the cost of providing other Settlement benefits, the attorneys' Fee Award, and any Incentive Award for the Class Representative in the State Action approved by the Court.

Privacy Protection Benefit. Each Settlement Class Member who submits a valid Claim Form will be eligible to initiate one (1) free year of Privacy Shield data privacy protection, a service designed to promote privacy and anonymity. The Postcard Notice provided directly to Settlement Class Members includes an enrollment code allowing Settlement Class Members to automatically enroll with Privacy Shield.

HOW TO GET BENEFITS

HOW DO I GET A SETTLEMENT PAYMENT?

If you are a Settlement Class member and you want to get settlement benefits, you must complete and submit a valid Claim Form **by September 29, 2025**. An online Claim Form is available on the Settlement Website and can be filled out and submitted online. You can also get a paper Claim Form by calling

By Order of: Hon. Ronald Barch, Circuit Court of the 17th Judicial Circuit, Winnebago County, Illinois
Page 4 of 10

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(833) 890-4932. We encourage you to submit a claim online at **www.dashcamsettlement.com**. It's faster, and it's free.

The Claim Form requires you to provide the following information: (i) your full name, (ii) your current U.S. Mail address, (iii) the name of the company or companies for which you were employed or working as an independent contractor when you operated a vehicle that was equipped with a Samsara dual-facing Dash Cam; and (iv) the approximate date(s) that you operated that vehicle.

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 or any of the other Released Parties relating to the alleged collection, use, storage, and disclosure of your biometric data. Giving up your legal claims is called a release. The precise terms of the release are 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.

WHEN WILL I BE PAID?

The hearing to consider the fairness of the Settlement is scheduled for **October 16, 2025 at 2:00 p.m. CT**. If the Court approves the Settlement, Settlement Class members whose claims were approved by the Settlement Administrator will be sent a check or potentially an electronic payment. Please be patient. All checks will expire and become void 120 days after they are issued. Uncashed checks will be donated to a not-for-profit entity agreed to by the Parties and approved by the Court, or such other organization as the Court may order consistent with the Illinois statutory requirements for *cy pres* recipients.

THE LAWYERS REPRESENTING YOU

DO I HAVE A LAWYER?

Yes, the Court has appointed lawyers Jason L. Lichtman, Sean A. Petterson, and Muriel Kenfield-Kelleher of Lieff Cabraser Heimann & Bernstein LLP, and Gary M. Klinger and Alexander E. Wolf of Milberg Coleman Bryson Phillips Grossman, LLC, to represent you and other Class Members. These attorneys are called “Class Counsel.” In addition, the Court appointed Plaintiff David Karling to serve as the Class Representative. He is a Class Member like you. Class Counsel can be reached by phone or email using the contact information set forth in the “Who Represents the Class” section below.

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 want your own lawyer, you will have to pay that lawyer.

HOW WILL THE LAWYERS BE PAID?

Class Counsel will ask the Court for attorneys’ fees in an amount not to exceed \$2,500,000, which is one-third of the total value of the Settlement (at least \$7,500,000) plus expenses (together, the “Fee Award”), and will also request an Incentive Award of \$5,000 for the Class Representative from the Settlement Fund. The Court will determine the proper amount of any attorneys’ fees and expenses to award Class Counsel and the proper amount of any award to the Class Representative. The Court may award less than the amounts requested.

YOUR RIGHTS AND OPTIONS

WHAT ARE MY OPTIONS?

(1) File a claim.

To receive a payment, you must submit a Claim Form **by September 29, 2025**. You may obtain a copy of the Claim Form at **www.dashcamsettlement.com**, and you may submit your Claim Form online at the same website, or by U.S. Mail to the Settlement Administrator at:

Dash Cam Settlement - 83234
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

If the Settlement is approved and your claim is deemed valid, a check will be mailed to you. ***Submitting a valid and timely Claim Form is the only way to receive a payment from this Settlement and is the only thing you need to do to receive a payment.***

(2) Exclude yourself.

You may exclude yourself from the Settlement. If you do so, you will not receive any cash payment and the Privacy Protection benefit, 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. All requests for exclusion must (a) be in writing; (b) identify the case name *Karling v. Samsara Inc.*, No. 2025-LA-0000175, Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois; (c) state the full name and current address of the person in the Settlement Class seeking exclusion; (d) include their assigned Claim ID number (if they received one); (e) include a statement explaining why they believe they are a member of the Settlement Class, including the name of the company for which they were employed or working as an independent contractor when they operated a vehicle that was equipped with a Samsara Dual-Facing Dash Cam and the approximate date(s) that they operated that vehicle; (f) be signed by the person seeking exclusion and sent directly by the person seeking exclusion to the Settlement Administrator; and (g) be postmarked or received by the Settlement Administrator on or before the Objection/Exclusion Deadline. Each request for exclusion must also contain a statement to the effect that “I hereby request to be excluded from the proposed Settlement Class in *Karling v. Samsara Inc.*, No. 2025-LA-0000175, Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois.” You must mail your request for exclusion so that it is **postmarked no later than September 8, 2025** to:

Dash Cam Settlement - 83234
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

No person may request to be excluded from the Settlement Class through “mass” or “class” opt-outs.

By Order of: Hon. Ronald Barch, Circuit Court of the 17th Judicial Circuit, Winnebago County, Illinois
Page 7 of 10

QUESTIONS? VISIT WWW.DASHCAMSETTLEMENT.COM OR CALL TOLL FREE (833) 890-4932

(3) Object to the Settlement.

If you wish to object to the Settlement, you must file a letter or brief in writing with the Clerk of the Court of the Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois, 400 West State Street, Rockford, Illinois 61101. The objection must be received by the Court **no later than September 8, 2025**. You must also send a copy of your objection by email to the attorneys for all Parties to the lawsuit, including Class Counsel Jason L. Lichtman, jlichtman@lchb.com, Sean A. Petterson, spetterson@lchb.com, and Gary M. Klinger, gklinger@milberg.com, and Defendant's Counsel, David Layden, dlayden@jenner.com, and Caroline Meneau, cmeneau@jenner.com, **no later than September 8, 2025**.

Any objection to the proposed Settlement must include (a) the Settlement Class Member's full name and current address, (b) their assigned Claim ID number (if they received one), (c) a statement explaining why they believe they are a member of the Settlement Class, including the name of the company for which they were employed or working as an independent contractor when they operated a vehicle that was equipped with a Samsara Dual-Facing Dash Cam and the approximate date(s) that they operated that vehicle, (d) the specific grounds for the objection, (e) all documents or writings that the Settlement Class Member desires the State Court to consider, (f) the name and contact information of any and all attorneys representing, advising, or in any way assisting the objector 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 the objector intends to appear at the Final Approval Hearing (either personally or through counsel, who must file an appearance or seek *pro hac vice* admission). 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 **September 8, 2025**. 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.

Class Counsel will file with the Court and post on the settlement website its request for attorneys' Fee Award and the Incentive Award on August 18, 2025.

You may appear at the Final Approval Hearing, which will be held on **October 16, 2025 at 2:00 p.m. CT** in Courtroom 426 of the Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois, 400 West State Street, Rockford, Illinois 61101 and via Zoom, in person or through counsel to show cause why the proposed Settlement should not be approved as fair, reasonable, and adequate. Attendance at the hearing is not necessary; however, persons wishing to be heard orally in opposition to the entry of the Final Approval Order, the request for the Fee Award, and/or the request for Incentive 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.

(4) 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.dashcamsettlement.com**, or call **(833) 890-4932**.

By Order of: Hon. Ronald Barch, Circuit Court of the 17th Judicial Circuit, Winnebago County, Illinois
Page 8 of 10

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THE COURT'S FINAL APPROVAL HEARING

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold the Final Approval Hearing at **2:00 pm CT on October 16, 2025** before the Honorable Ronald Barch in Room 426 of the Circuit Court for the 17th Judicial Circuit, Winnebago County, Illinois, 400 West State Street, Rockford, Illinois 61101 and via Zoom. 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; and whether it was made in good faith. **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 the Fee Award and the Incentive Award to the Class Representative.**

Note: The date and time of the Final Approval Hearing are subject to change by Court Order, and the hearing may be conducted remotely. Any changes will be posted at the Settlement Website, www.dashcamsettlement.com.

DO I HAVE TO COME TO THE HEARING?

No. Class Counsel will answer any questions the Court may have. You are, however, 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 described in the Settlement, the Court will consider it. You may also pay a lawyer to attend, but you don't have to.

MAY I SPEAK AT THE HEARING?

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

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.

Jason L. Lichtman
Sean A. Petterson
Muriel Kenfield-Kelleher
Lieff Cabraser Heimann & Bernstein LLP
250 Hudson Street, 8th Floor
New York, New York 10013
jlichtman@lchb.com
spetterson@lchb.com
mkenfieldkelleher@lchb.com

Gary M. Klinger
Alexander E. Wolf
Milberg Coleman Bryson Phillips
Grossman, LLC
227 W. Monroe Street, Suite 2100
Chicago, Illinois 60606
gklinger@milberg.com
awolf@milberg.com

WHERE CAN I GET ADDITIONAL INFORMATION?

This Notice is only a summary of the proposed Settlement of this lawsuit. More details are in the Settlement Agreement which, along with other documents, can be obtained at **www.dashcamsettlement.com**. If you have any questions, you can also call the Settlement Administrator at **(833) 890-4932** or Class Counsel at the number or email addresses set forth above. In addition to the documents available on the Settlement 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.

WHAT IF MY CONTACT INFORMATION CHANGES OR I NO LONGER LIVE AT MY ADDRESS?

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below, calling toll-free **(833) 890-4932** or at the Contact page of the Settlement Website:

Dash Cam Settlement - 83234
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANT WITH
QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.**