

Michalski v. MIB Group, Inc., et al.
c/o Apex Class Action LLC
PO Box 54668
Irvine, CA 92619

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LEGAL NOTICE OF CLASS ACTION SETTLEMENT

A Settlement has been reached in a class action lawsuit asserting Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”) violations against MIB Group, Inc. and MIB, LLC (together, “MIB”) based on Plaintiff’s claim that MIB failed to identify all of the sources of information it maintained in its files about consumers in response to consumer requests their consumer files. Specifically, Plaintiff Daniel Michalski asserts that when he made a request for his file disclosure to MIB, MIB provided a response that stated it received information from “a service provider” without specifically identifying the provider by name.

Plaintiff’s legal claim is that MIB violated a federal law called the FCRA. Plaintiff alleges that MIB acted in the same way with respect to other individuals, called the “Settlement Class.” The lawsuit is known as *Michalski v. MIB Group, Inc., et al.* Case No. 1:24-cv-10227-DJC.

MIB has denied and continues to deny Plaintiff and the Settlement Class’s allegations or that it that it has violated the FCRA or engaged in any wrongful acts. Specifically, MIB asserts that it did not violate the FCRA’s disclosure requirement because its furnishers did not specifically identify service providers by name. Nevertheless, Plaintiff and MIB have agreed to resolve the claims of a group of consumers defined as:

All individuals with an address in the United States (including all territories and other political subdivisions of the United States) to whom Defendants provided a consumer file disclosure letter specifically including a record which references medical information from a Service Provider from January 29, 2022 through May 14, 2025.

To resolve the lawsuit, MIB has agreed to make changes to its practices when a consumer disputes data contained in their consumer file, and the file includes medical information from a Service Provider, to provide consumers with information about the sources of information if available, and pay \$2.425 million for the creation of a Settlement Fund that will be used for class member payments, administrative costs, attorneys’ fees, litigation expenses, and a service award to Plaintiff. A summary of the terms of the settlement is below – please read it carefully and note the deadlines to take action. There is more detailed information about the case and settlement following the summary.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING AND RECEIVE A CHECK	<p>If you do not exclude yourself from the Settlement, you will receive a settlement payment automatically. The amount of the payment is expected to be approximately \$140.</p> <p>If the Court approves the Settlement and it becomes final and effective, a check will be mailed to the address maintained by MIB for you, or you can elect to receive a digital payment. You will give up your right to bring your own lawsuit against MIB about claims related to MIB failing to identify its sources of information.</p> <p>You may update and/or confirm your address with the Settlement Administrator https://www.mibfcraclassaction.com.</p>
EXCLUDE YOURSELF FROM THE SETTLEMENT	<p>You may exclude yourself from the Settlement if you wish. In doing so, you will receive no benefits from the lawsuit. This is the only option that will retain your right to bring your own lawsuit against MIB about claims related to MIB failing to identify its sources of information to you. You must request exclusion by December 20, 2025 For more information about how to exclude yourself, see https://www.mibfcraclassaction.com</p>
OBJECT	<p>You may object to any of the terms of the settlement agreement, including the proposed award of attorneys’ fees of \$808,333.33, and expenses of \$25,000, and/or the separate service award to the Plaintiff of \$5,000. For more information on these awards, including Class Counsel’s request for fees which will be available on December 6, 2025 at https://mibfcraclassaction.com/important-documents</p> <p>Your deadline to object is December 20, 2025. You must do so by writing to the Settlement Administrator, and to the Court. For more information about how to submit an objection and what you must include, see https://www.mibfcraclassaction.com</p>
GO TO A HEARING	<p>You may speak at the final approval hearing, set for February 4, 2026 if you submit an objection by December 20, 2025. and mail in a letter saying that you would like to appear and be heard at the hearing.</p>

ADDITIONAL CASE DETAILS

The Court has not decided which side is right. MIB has denied and continues to deny Plaintiff and the Settlement Class's allegations or that it that it has violated the FCRA or engaged in any wrongful acts. The Court has preliminarily approved the proposed settlement agreement (available at <https://mibfcraclassaction.com/important-documents>) to which the parties have agreed (the "Settlement"). A hearing is scheduled for February 4, 2026 to decide whether to approve the Settlement and whether to approve Class Counsel's request for attorneys' fees and expenses. If you received a written or email notice about the settlement, it is because you are a member of the following Settlement Class according to MIB's records:

All individuals with an address in the United States (including all territories and other political subdivisions of the United States) to whom Defendants provided a consumer file disclosure letter specifically including a record which references medical information from a Service Provider from January 29, 2022 through May 14, 2025.

Read this notice carefully. This notice advises you of the benefits that may be available to Settlement Class Members under the proposed Settlement and their rights and options. You may also review the full Settlement Agreement, and the papers filed in support of approval of the Settlement at <https://www.mibfcraclassaction.com>. These rights and options—**and the deadlines to exercise them**—are explained in this notice. The Court still has to decide whether or not to approve the Settlement. If it does, and any appeals are resolved, benefits will be distributed to members of the Settlement Class.

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BASIC INFORMATION

1. Why is there a notice?

A court ordered that this notice be provided because you have a right to know about the proposed Settlement of this class action lawsuit and its effect on you. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Denise J. Casper, of the United States District Court for the District of Massachusetts, is overseeing this case, *Michalski v. MIB Group, Inc., et al.* Case No. 1:24-cv-10227-DJC. The person who sued—Daniel Michalski—is the Plaintiff. MIB Group, LLC and MIB, Inc. (together “MIB”) are the Defendants.

2. What is this case about?

Plaintiff Daniel Michalski has alleged that after he requested his file disclosure from MIB, MIB provided him a response that did not identify all of the sources of information contained in his MIB file. Instead, for some of the items of information, MIB stated that the information was obtained from “a service provider” without identifying the service provider. Plaintiff asserts that MIB’s actions violated section 1681g(a)(2) of the federal Fair Credit Reporting Act (“FCRA”).

You can review the complaint and other documents filed in this lawsuit at <https://mibfcraclassaction.com/important-documents>

3. Why is this a class action?

In a class action lawsuit, one or more people called the “Class Representative,” in this case Daniel Michalski, sue on behalf of other people who have similar claims. All of the people together are called a “Class” or “Class Members.” The consumer reporting agency he sued, MIB, is called the Defendant. One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

4. Why is there a Settlement?

The Court has not decided whether MIB has violated the law, nor how much money, if any, should be awarded to the class. Instead, the two sides have agreed to a Settlement.

MIB has denied and continues to deny Plaintiff and the Class’s allegations or that it that it has violated the FCRA or engaged in any wrongful acts. Nevertheless, MIB agreed to settle the Litigation solely for the purpose of avoiding the further expense, inconvenience and distraction of burdensome and protracted litigation and to obtain the release, order and judgment contemplated by the Settlement.

WHO IS PART OF THE SETTLEMENT?

5. Who are the Settlement Class Members?

If you received notice of the Settlement from a postcard or email addressed to you, then according to TransUnion’s records, you are a member of the Settlement Class: all individuals with an address in the United States (including all territories and other political subdivisions of the United States) to whom Defendants provided a consumer file disclosure letter specifically including a record which references medical information from a Service Provider from January 29, 2022 through May 14, 2025.

There are approximately 11,000 members of the Settlement Class.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Practice Changes

As a result of the Settlement, MIB has agreed to implement changes to its practices for providing consumers with information regarding its sources of information.

When a consumer disputes their MIB Consumer File and the file includes medical information from a Service Provider, the following practice change applies.

Furnishers must:

- Use reasonable efforts to identify the underlying medical provider(s) (e.g., physician, lab) if the original source was a Service Provider.
- If identified, include the provider(s) by name in their communication to the consumer after completing the reinvestigation process.

Settlement Fund

MIB has agreed to establish a Settlement Fund of two million four hundred twenty five thousand dollars (\$2,425,000.00), which will be used to make payments to all Settlement Class Members. The Settlement Fund will also cover the costs of administering the settlement, a \$5,000 service award to Plaintiff Daniel Michalski, and \$808,333.33 in attorneys’ fees and up to \$25,000.00 in litigation expenses.

7. How much will my payment be?

The amount of payments to Settlement Class Members is expected to be approximately \$140.00.

8. When will I receive my payment?

If the Court approves the Settlement and it becomes final, then payments will automatically be sent by mail to the address maintained by MIB for each Settlement Class Member. Settlement Class Members can update their mailing address at <https://www.mibfcraclassaction.com>. Settlement Class Members may also set up an electronic payment method through the website if preferred; otherwise, payment will be mailed via USPS as a paper check.

Payments will be sent only after the Court grants final approval to the Settlement and after any appeals are resolved (*see* “The Final Approval Hearing” below). If there are appeals, resolving them can take time. Please be patient, and check this website for updates.

9. What am I giving up if I participate in the Settlement?

If the Settlement receives Final Approval from the Court, every Settlement Class Member agrees to release MIB Group, Inc., and MIB, LLC and each of its owners, shareholders, unitholders, predecessors, successors and assigns; the past, present, and future, direct and indirect, and parents (including, without limitation, holding companies); and the past, present and future principals, trustees, partners, insurers, officers, directors, employees, advisors, attorneys, owners, shareholders, unitholders, predecessors, successors, assigns, representatives, heirs, executors, and administrators of any of the above (collectively, “Released Parties”), from any and all claims asserted in the Complaint under FCRA at 15 U.S.C. §§ 1681g(a)(2). Class members’ right to seek relief under the FCRA for other claims will be preserved.

Section 12 of the Settlement Agreement at <https://mibfcraclassaction.com/important-documents> describes the legal claims that you give up if you remain in the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

10. How do I exclude myself from the Settlement?

If you don’t want benefits from the Settlement, and you want to keep the right to sue TransUnion on your own about the claims in this case, then you must take steps to opt out of the Settlement. This is called excluding yourself—or it is sometimes referred to as “opting out” of the Settlement.

To exclude yourself from the Settlement, you must submit a statement to the Settlement Administrator with the following information:

- Your full name, address, e-mail address, and telephone number;
- A statement that you want to be excluded from the Settlement in this Action;
- The unique identifier included on the Notice you received via email or US Mail.

You must submit your exclusion request no later than **December 20, 2025** to **claims@apexclassaction.com** or mail to **PO Box 54668, Irvine, CA 92619**.

11. If I do not exclude myself, can I sue MIB for the same thing later?

No. If you do not exclude yourself, you will give up the right to sue MIB for the claims that the Settlement resolves regarding MIB’s alleged failure to identify its sources of information in response to disclosure request. You must exclude yourself from the Settlement Class if you want to pursue your own lawsuit.

12. If I exclude myself, will I receive a payment from the Settlement?

No. You will not receive a payment if you exclude yourself from the Settlement.

THE LAWYERS REPRESENTING THE ENTIRE SETTLEMENT CLASS

13. Do I have a lawyer in the case?

The Court has appointed counsel to represent you and others in the Settlement Class as “Class Counsel”:

James A. Francis
John Soumilas
Lauren KW Brennan
FRANCIS MAILMAN SOUMILAS, P.C.
1600 Market Street, Suite 2510
Philadelphia, PA 19103

Class Counsel will represent you and others in the Settlement Class. You will not be charged for these attorneys. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid? What will the named plaintiff receive?

The attorneys representing the Class have handled this case on a contingency basis. To date, they have not been paid anything for their work since the case began in 2018. Class Counsel will request that the Court award attorneys' fees and expenses for the time and effort they have spent on this case.

The amount that will be requested by Class Counsel will be \$808,333.33 in attorneys' fees, up to \$25,000 in litigation expenses, and up to \$5,000 for a service award to Daniel Michalski. The Parties have also agreed to resolve Mr. Michalski's separate individual claims, which are not shared by the members of the Settlement Class, through a separate individual settlement.

Any approved amount of attorneys' fees and expenses or service award will be paid from the settlement fund, and no Class Member will owe or pay anything directly for the attorneys' fees and expenses of Class Counsel.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

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

If you are a member of the Settlement Class, you can object to any part of the Settlement, the Settlement as a whole, and/or Class Counsel's request for attorneys' fees and expenses. To object, you must either submit your objection on the case docket using the CM/ECF electronic filing system, or submit a letter to the Court at the following address:

Clerk of Court
U.S. DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

You must also send a copy of your objection to the Settlement Administrator at:

Apex Class Action, LLC
PO Box 54668
Irvine, CA 92619

Your objection must be submitted on or before December 20, 2025 and must include:

- The name of this Action *Michalski v. MIB Group, Inc., et al.* Case No. 1:24-cv-10227-DJC.
- Your full name, address, email address and telephone number;
- a detailed statement of each objection asserted, including the grounds for objection and reasons for appearing and being heard,
- any documents you wish to be considered in support of the objection;
- the identity any lawyer representing you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement;
- any and all agreements that relate to the objection or the process of objecting—whether written or oral—between you or your counsel and any other person or entity;
- the identity of all counsel representing you who will appear at the Final Approval Hearing;
- All relief sought;
- The number of times you have objected to a class action settlement in the past five (5) years, including the caption of each case in which you made such objection;
- Whether you intend to appear and/or testify, or counsel representing you intends to appear, at the hearing that the Court has scheduled to determine whether to grant final approval of the Settlement and Class Counsel's request for attorneys' fees (the "Final Approval Hearing"); and,
- Your signature.

THE FINAL APPROVAL HEARING

The Court will hold a Final Approval Hearing to decide whether to approve the Settlement and whether to approve Class Counsel's request for attorneys' fees and expenses. You may attend and you may ask to speak, but you don't have to do so.

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

The Court has scheduled a Final Approval Hearing on **February 4, 2026 at 3:00 pm in Courtroom 11 (5th Floor)** at the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210. The hearing may be virtual or moved to a different date or time without additional notice, so it is a good idea to check <https://www.mibfcraclassaction.com> for updates. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider any requests by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them at the hearing. After the hearing, the Court will decide whether to approve the Settlement, the request for attorneys' fees and expenses. We do not know how long these decisions will take.

17. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you may attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you submit your written objection on time and it complies with the requirements set forth in Question 15 above and in Section 8 of the Settlement Agreement, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

18. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must submit an objection that complies with the requirements set forth in Question 15 above and send a letter saying that you intend to appear and wish to be heard. Your notice of intention to appear must include the following:

- Your full name, address, and telephone number;
- A statement that this is your "Notice of Intention to Appear" at the Final Approval Hearing for Settlement in *Michalski v. MIB Group, Inc., et al. Case No. 1:24-cv-10227-DJC*.
- The reasons you wish to be heard;
- Copies of any papers, exhibits, or other evidence or information that is to be presented to the Court at the Final Approval Hearing; and
- Your signature (an attorney's signature is not sufficient).

You must submit your Notice of Intention to Appear so that it is received no later than December 20, 2025, to the addresses in Question 15 above.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

If you do nothing, you will receive the benefits to which you are entitled under this Settlement, which includes a payment of approximately \$140 as well as MIB's agreement to make the changes to its business practices as explained in Section 6.

GETTING MORE INFORMATION

20. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can obtain the complete Settlement Agreement at <https://mibfcraclassaction.com/important-documents>. You also may write with questions to the Settlement Administrator at claims@apexclassaction.com or mail to PO Box 54668, Irvine, CA 92619, or call the toll-free number, 1-800-355-0700. **Please do not contact MIB or the Court for information.**