

**IMPORTANT LEGAL NOTICE – PLEASE DO NOT DISCARD**

**Re: Eric Rivers, Vidal McLaurin, and Arrion Ford, on behalf all others similarly situated v. Southway Carriers, Inc. and Ivan Bojic,**  
Case No. 23-cv-00738 pending in the Northern District of Illinois, Eastern Division

**This settlement notice has been authorized by a Court. Please read it carefully.**

**As a Class Member in this Action you are eligible to receive a settlement check if you submit a valid W-9, as summarized below.**

**A. Introduction and Summary**

Eric Rivers, Arrion Ford, and Vidal McLaurin (the “Class Representatives”) sued Southway Carriers, Inc. and its owner Ivan Bojic (“Southway”) in the United States District Court for the Northern District of Illinois alleging violations of the Truth-in-Leasing Regulations (“TIL”) and Illinois Wage Payment and Collection Act (“IWPCA”), captioned *Eric Rivers, Vidal McLaurin, and Arrion Ford, on behalf all others similarly situated v. Southway Carriers, Inc. and Ivan Bojic*, Case No. 23-cv-00738 (the “Lawsuit”).

The Court certified the Lawsuit as a class action under Rule 23 for the TIL and IWPCA claims and Class Notice was sent. Our records indicate that you did not opt-out of the class and are included in this Settlement.

Your legal rights are affected whether you act or don’t act, so read this notice carefully.

**To receive your pro rata share of the settlement, you must submit a valid W-9 form.** All claims for Rule 23 class members whether they submit a valid claim form or not, will be released.

This Notice is to inform you about the status of the Lawsuit. The Court has allowed this notice to be sent. **Your legal rights are affected and you have a choice to make now.**

YOUR LEGAL RIGHTS AND OPTIONS	
<b>Option 1: Submit a Claim</b>	The only way to receive a cash payment from this Settlement is by submitting a valid and timely W-9 Form. The deadline to submit a W-9 Form is <b>February 11, 2026</b> .  You can submit your W-9 Form through mail to the Class Administrator or online at <a href="http://www.southwaycarrierssettlement.com">www.southwaycarrierssettlement.com</a> . You may also call or email Class Counsel if you have questions.
<b>Option 2: Object to the Settlement</b>	You may object to the Settlement. All objections must be in writing and personally signed by the Class Member and include: (1) the objector’s name, address, and telephone number; (2) the name and number of the case; and (3) the basis for the objection to the Settlement. The written objection must indicate whether the Class Member and/or their lawyer(s) intend to appear at the Final Approval Hearing. Any lawyer who intends to appear at the Final Approval Hearing also must enter a written Notice of Appearance of Counsel with the Clerk of the Court. The deadline to object to the Settlement is March 2, 2026.
<b>Option 3: Do Nothing</b>	If you do nothing, you will not get a payment from this Settlement.

**1. What is this lawsuit about?**

In the lawsuit, the Class Representatives allege that Southway violated the IWPCA, 820 ILCS §§ 115/1, *et seq.*, and the TIL, 49 C.F.R. §§ 376.1, *et seq.*, by misclassifying truck drivers as independent contractors and taking unauthorized deductions from drivers’ wages under non-compliant Lease and Lease-to-Purchase Agreements.

Specifically, the Class Representatives allege that Southway misclassified drivers as independent contractors under non-compliant lease and lease-to-purchase agreements and took unauthorized deductions from drivers’ wages for deposits, tolls, “transflo”, insurance, trailer rent, escrow accounts, tickets, vehicle repairs, electronic logging devices, tires, and fuel cash advances.

A federal court authorized this Notice because you have a right to know about the proposed Settlement of this lawsuit and about your options before the Court decides whether to grant Final Approval of the Settlement.

**2. What is a class action and what does the Settlement Provide?**

In a class action, a Class Representative (in this case, Plaintiffs Eric Rivers, Vidal McLaurin, and Arrion Ford) sues on behalf of a group (or a “Class”) of people. Here, the Class Representatives sued on behalf of people who have similar claims regarding the misclassification of truck drivers and taking of unauthorized deductions from drivers’ wages. The Parties entered a settlement conference and agreed to a Settlement to avoid the costs and risks of continued litigation and collection of a judgment. You did not opt-out and are eligible to receive a cash payment from the Settlement.

The Defendants have agreed to pay one hundred and twenty thousand (\$120,000) into a Settlement Fund for payment of: (i) cash benefits to Class Members who submit valid W-9; (ii) Attorneys’ Fees and Costs including costs of notice and other administrative costs incurred by administering the Settlement; and (iii) any Service Award to Class Representatives, not to exceed \$5,000, as may be ordered by the Court

### 3. How do I know if I am a part of the Class?

The Court has certified a class for the IWPCA and TIL claims consisting of all people who meet the following definition:

#### Rule 23 Class:

All persons and entities that entered and operated under a “Lease Agreement” or “Lease-to-Purchase” Agreement with Southway Carriers, Inc. from February 6, 2013, through December 2, 2025.

Notice was sent to the Class and the deadline to opt-out has passed. The Class period ends upon the date of the Preliminary Approval.

### 4. How do I participate in the Settlement?

To receive a Settlement Check Class Members must:

#### **Submit a W-9 Form**

All Class Members who wish to receive cash benefits from the Settlement must submit a Valid W-9 Form by **February 11, 2026**. You may complete and submit a W-9 via mail to the Class Administrator at the address below or online at [www.southwaycarrierssettlement.com](http://www.southwaycarrierssettlement.com)

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

Class Members who timely submit a Valid W-9 Form will receive their payment via paper checks. Settlement Funds will be distributed on a pro rata based upon the amount of each Class Members’ damages. The exact amount each Class Member will depend upon the amount of Valid W-9 Forms submitted and the amount of each Class Member’s damages. Class Members who receive Settlement Checks shall be solely responsible for any and all tax obligations associated with this Settlement.

If there are any remaining funds that could not be distributed, the Parties will request the Court approve awarding those remaining funds *cy pres* to Legal Aid Chicago, 120 S. LaSalle St., Suite 900, Chicago, IL 60603.

### 5. Do I need to hire a lawyer in this case?

No. To represent the classes, the Court has appointed attorneys with the law firm The Law Office of Kenneth T. Goldstein, PLLC, 20 North Wacker Drive, Suite 1006, Chicago, IL 60606, Phone: 312-606-0500 as “Class Counsel.” You may hire your own attorney, but only at your own expense.

Class Counsel may apply to the Court for an award of Attorneys’ Fees in a total amount not to exceed forty thousand dollars (\$40,000). They will also ask the Court to approve Costs including the cost to administer the Settlement. The Court may award less than these amounts. If approved, these fees and costs will be paid from the Settlement Fund.

### 6. How Do I “Object” to the Settlement?

You may “object” to the Settlement if you do not like it or a portion of it. To object to the Settlement, you must submit the objection in writing and be personally signed by the Class Member and include:

- your name;
- address;
- telephone number;
- the name and number of this case;
- a statement providing the basis for the objection; and must indicate if the Class Member and/or their lawyer intends to appear at the Final Approval Hearing.

You must submit your objection no later than March 2, 2026.

### 7. What Claims Am I Releasing?

As a Class Member, you cannot sue, continue to sue, or be part of any lawsuit against the Defendants about any of the legal claims regarding the IWPCA and TIL that this Settlement resolves. The “Release” section in the Settlement Agreement describes the legal claims that you give up. The Settlement Agreement is available from Class Counsel via email upon request.

### 8. When is the Court’s Final Approval Hearing?

The Court will hold a Final Approval Hearing at 9:00 a.m. (CT) on March 5, 2026, **by telephone. The following call-in number will be used for the hearing: 650-479-3207; access code 2305-915-8729.** At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. It will also consider whether to approve Class Counsel’s request for an Award of Attorneys’ Fees and Costs, as well as Service Awards for the Class Representatives. If there are objections, the Court will consider them. After the hearing, the Court will decide whether to approve the Settlement.

### 9. How can I get further information?

For additional information you may contact Class Counsel, whose contact information is provided above. **No inquiries should be directed to the Court.**