

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Tapia-Rendon v. Employer Solutions Staffing Group II, LLC, et al., Case No. 21-cv-3400

**IF YOU USED A WORKEASY, EASYCLOCKING, EASYWORKFORCE, OR
TIMELOGIX FINGERPRINT TIMECLOCK IN ILLINOIS BETWEEN JUNE 24, 2016
AND AUGUST 15, 2023, YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A
CLASS-ACTION SETTLEMENT.**

This is an official court notice. You are not being sued. This is not an ad for a lawyer.

- A settlement has been reached in a class action filed against WorkEasy Software, LLC f/k/a EasyWorkforce Software, LLC (“EasyWorkforce”). The lawsuit claims that WorkEasy violated an Illinois law called the Biometric Information Privacy Act (“BIPA”) by capturing, collecting, and disclosing biometric data without proper consent, and by failing to adequately secure that data. EasyWorkforce denies any wrongdoing and says that it has not violated any laws. The Settlement does not establish who is right or wrong, but rather is a compromise to end the lawsuit and avoid the uncertainties and expenses that come with continuing in court.
- You may be included in this class action if, between June 24, 2016 and August 15, 2023, you used a WorkEasy, EasyClocking, EasyWorkforce, or TimeLogix fingerprint timeclock to clock in and out at a job in Illinois. Some exceptions to participating apply. For example, people who previously opted out of the Class or reached separate settlement agreements with EasyWorkforce are not included.
- If you submit a valid claim form and the Court approves the settlement, the amount you receive as payment will depend on when you started using the WorkEasy, EasyClocking, EasyWorkforce, or TimeLogix fingerprint timeclock. If you are a member of the Subclass that started using the device on or before April 30, 2022, you will likely receive payments totaling between approximately \$225 and \$750 over the course of five years. If you are not a member of the Subclass, you will likely receive payments totaling between approximately \$160 and \$500 over the course of five years. These amounts may change depending on how many people submit valid claims. All litigation costs, settlement expenses, and legal fees will be separately paid from the settlement fund.
- Please read this notice carefully. Your legal rights are affected whether or not you act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
SUBMIT A CLAIM FORM BY MARCH 31, 2026	This is the only way to receive payment. Claim Forms can be found and submitted at the Settlement Website www.EasyWorkforceBIPALawsuit.com. As a member of the Class, you will give up your rights to sue EasyWorkforce in the future regarding the claims in this case.
EXCLUDE YOURSELF BY FEBRUARY 25, 2026	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against EasyWorkforce for the claims in this Settlement. If you exclude yourself, you will give up the right to receive any benefits from this Settlement.
OBJECT OR COMMENT ON THE SETTLEMENT BY FEBRUARY 25, 2026	You may object to the Settlement and requested Attorneys' fees and expenses by writing to the Court and informing it why you don't think the Settlement or the requested attorneys' fees and expenses should be approved. If you object, you may also file a Claim Form to receive a payment, but you will give up the right to sue EasyWorkforce in a separate lawsuit about the legal claims this Settlement resolves.
GO TO THE HEARING ON APRIL 28, 2026	You can telephonically attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must make a request to do so in your written objection or comment. You are <u>not</u> required to attend the Final Approval Hearing.
DO NOTHING	If you do nothing, you will not receive any payment from the Settlement and you will give up your rights to sue EasyWorkforce regarding the claims in this case.

- 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 and the requested attorneys' fees and expenses. No Settlement payments will be provided unless the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. What is this notice and why should I read it?

A Court authorized this notice to let you know about a proposed settlement with EasyWorkforce. You have legal rights and options that you may act on before the Court decides whether to approve the proposed settlement. You may be eligible to receive a cash payment as part of the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Matthew Kennelly of the United States District Court for the Northern District of Illinois is overseeing this class action. The case is called *Tapia-Rendon v. Employer Solutions Staffing Group II, LLC, et al.*, Case No. 21-cv-3400. The person who filed this lawsuit, Maria Tapia-Rendon, is the Plaintiff. One of the companies she sued, EasyWorkforce, is a Defendant.

2. What is a class action?

A class action is a lawsuit in which one or more plaintiffs—in this case, Maria Tapia-Rendon—sue on behalf of a group of people who have similar claims. Together, this group is called a “Class” and consists of “Class Members.” In a class action, the court resolves the issues for all class members, except those who exclude themselves from the class. In this case, the Court certified both a class and a smaller group within that class known as a subclass.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

3. What is this lawsuit about?

This lawsuit alleges that EasyWorkforce violated a law called the Biometric Information Privacy Act (“BIPA”) by storing information from fingerprint-scanning timeclocks in Illinois without complying with the law’s requirements. That law says companies can’t possess, collect, store, or share biometric data, which includes things like face, hand, or fingerprint scans, without first giving notice and getting consent. BIPA also requires companies that collect those types of information to adequately secure that data.

EasyWorkforce denies all of the claims in the lawsuit. EasyWorkforce claims that the type of information it collected isn’t covered by BIPA, that it didn’t disclose that information, and that it adequately secured the information it possessed. The Court has ruled that the type of information EasyWorkforce allegedly collected is covered by BIPA, and it ruled that EasyWorkforce didn’t disclose that information. The Court has not decided whether EasyWorkforce collected the information, or whether it complied with BIPA’s consent requirements in doing so.

The Settlement is not an admission of wrongdoing by EasyWorkforce. More information about the complaint in the lawsuit and EasyWorkforce’s position can be found in the “Court Documents” section of the settlement website at www.EasyWorkforceBIPALawsuit.com.

WHO'S INCLUDED IN THE SETTLEMENT

4. Who is included in the Class and Subclass?

The Court decided that the Class includes anyone who used a cloud-based EasyWorkforce biometric device in Illinois on from June 24, 2016 to August 15, 2023, and that the Subclass includes all Class members who used a cloud-based EasyWorkforce biometric device in Illinois on or before April 30, 2022. The relevant biometric devices may be familiar to you under the WorkEasy, EasyWorkforce, EasyClocking, or TimeLogix brand names.

There are approximately 21,915 people in the Class, and 19,248 people in the Subclass.

5. Who is not included in the Class?

Some users of EasyWorkforce's timeclocks in Illinois are excluded from the Class, including anyone who previously opted out of the Class. The Settlement Agreement has a list of the categories of people who are excluded. Other persons are excluded because they worked for the judges or lawyers involved.

6. How do I know if I am in the Class?

If you used a WorkEasy, EasyWorkforce, EasyClocking, or TimeLogix branded fingerprint scanning timeclock in the State of Illinois at any time from June 24, 2016 to August 15, 2023, and you are not subject to any of the exclusions above, then you are a member of the Class and are entitled to a cash payment.

7. How do I know if I am in the Subclass?

If you used a WorkEasy, EasyWorkforce, EasyClocking, or TimeLogix branded fingerprint scanning timeclock in the State of Illinois at any time from June 24, 2016 to April 30, 2022, and you are not subject to any of the exclusions above, then you are a member of the Subclass and are entitled to a cash payment.

8. Can I be a member of both the Class and the Subclass?

Yes. Every member of the Subclass is automatically also a member of the Class. But not every Class member is necessarily in the Subclass. For example, if you didn't start using the WorkEasy, EasyWorkforce, EasyClocking, or TimeLogix branded fingerprint scanning timeclock until May 2022 or later, then you can't be a member of the Subclass.

THE SETTLEMENT BENEFITS

9. What does the Settlement provide?

If the Court approves the settlement, EasyWorkforce and its insurers have agreed to pay \$1,685,000 over five years to create a “Settlement Fund.” If the Court approves the settlement, EasyWorkforce and its insurers will pay \$535,000 within two weeks, and then EasyWorkforce will pay an additional \$115,000 every six months until the full \$1,685,000 has been paid. EasyWorkforce has also agreed to a process for deleting the data of its customers’ employees and its former customers’ employees, to maintain recently implemented consent procedures, and to maintain encryption of the fingerprint data.

The costs of administering the settlement, Class Counsel’s attorneys’ fees and costs, and an incentive award to the Class Representative will, if approved by the Court, be paid from the Settlement Fund. The remaining amount will be used to pay Class Members who submit valid claims. The exact number of payments will depend on the number of valid claims submitted, but Plaintiff expects that each Class Member who submits a valid claim will receive payments totaling between \$160 and \$750 over the course of five years.

If any settlement checks go uncashed, they will be rolled over to the next payment. If any money remains after the last payments have been issued, then that leftover money will be redistributed to those Class Members who timely cashed their checks or other payments. That redistribution will continue until there’s no longer enough money left in the Settlement Fund to cover the cost of making further payments, at which point it will be distributed to the Illinois Treasurer’s Unclaimed Property Division.

HOW TO GET BENEFITS

10. How do I get payment?

To get a payment, you must submit a Claim Form, which can be found on the Settlement Website, postmarked or submitted electronically by March 31, 2026. Claim Forms may be submitted online at www.EasyWorkforceBIPALawsuit.com or by U.S. mail to the following address: *EasyWorkforce Class Action Administrator*, P.O. Box 2790, Baton Rouge, LA 70821-2790. You can elect to receive your payment by check or electronically by ACH, Zelle, Venmo, PayPal, or digital Mastercard on the Settlement Website.

The money in the Settlement Fund will be distributed to Class Members who file approved claims using an allocation formula, with Class Members who are also Subclass Members receiving an extra 50% compared to those Class Members who are not Subclass Members. The payments will be calculated using an allocation formula, after deducting any Court-approved attorneys’ fees and expenses, service award to the Class Representative, and costs of settlement notice and administration.

11. When Will I get my payment?

The Court will hold a hearing to consider the fairness of the Settlement on April 28, 2026. If the Court approves the Settlement, the Settlement Administrator will distribute the first round Settlement Payments within 73 days of the Court finally approving the settlement, or any appeals process completing. Every year after that, the Settlement Administrator will send another, smaller payment, and will continue doing so until all payments have been made.

If your address or payment details change before the payments have concluded, please contact the Settlement Administrator at 1-844-917-4405 to update your information.

12. I'm still not sure if I'm included.

If you are still not sure whether you are included in either the Class or Subclass, please call settlement administrator at 1-844-917-4405.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

The Court has appointed Thomas R. Kayes of Loevy + Loevy and J. Dominick Larry of Nick Larry Law LLC as the attorneys to represent the Class and Subclass. They are called "Class Counsel." In addition, the Court appointed Plaintiff Maria Tapia-Rendon to serve as the Class Representative. She is a Class Member like you.

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel are working on your behalf. You can hire your own lawyer, but you will have to pay that lawyer.

15. How will the lawyers be paid?

Class Counsel will ask the Court to attorneys' fees of one-third of the settlement fund and for reimbursement of \$253,376.31 in out-of-pocket expenses incurred. If approved by the Court, Class Counsel's attorneys' fees will be paid out over time, just like the payments to Class Members. Class Counsel will also request an incentive award of \$10,000 for the Class Representative, also to be paid over time like the Class Member payments.

Class Counsel will file a motion asking for approval of the requested attorneys' fees, expenses, and incentive award no later than February 11, 2026, and that motion will be available for review on the Settlement Website. The Court will determine the proper amount of attorneys' fees and expenses to award Class Counsel and the proper amount of any incentive award to the Class Representative. The Court may award less than the amounts requested.

YOUR RIGHTS AND OPTIONS

16. What happens if I do nothing at all?

If you do nothing, you will be a Class Member, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court, but you won't receive a payment. Unless you exclude yourself, you won't be able to start a lawsuit or be part of any other lawsuit against EasyWorkforce or any related entity for the claims or legal issues being resolved by this Settlement.

17. What happens if I ask to be excluded?

If you exclude yourself from the Settlement, you will receive no payment under the Settlement, and you will no longer be a Class Member. You will keep your right to start your own lawsuit against EasyWorkforce for the same legal claims at issue in this lawsuit. You will not be legally bound by the Court's judgments related to the Class and EasyWorkforce in this class action.

18. How do I ask to be excluded?

You can mail a letter stating that you want to be excluded from the Settlement. Your letter must: (1) be in writing, (2) identify the case name, "*Tapia-Rendon v. Employer Solutions Staffing Group II, LLC, et al.*, Case No. 21-cv-3400," (3) state your full name and current address, (4) be physically signed by you or your representative, and (5) be postmarked for delivery by mail to the Settlement Administrator on or before February 25, 2026. Your request to be excluded must also include a statement to the effect that: "I hereby request to be excluded from the proposed Class in *Tapia-Rendon v. Employer Solutions Staffing Group II, LLC.*" You must mail your exclusion request no later than February 25, 2026 to: *EasyWorkforce Class Action Administrator*, P.O. Box 2790, Baton Rouge, LA 70821-2790. You can't exclude yourself over the phone.

19. If I don't exclude myself, can I sue EasyWorkforce for the same thing later?

No. Unless you exclude yourself, you give up any right to sue EasyWorkforce and any other released party for the claims being resolved by this Settlement.

20. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you will not receive a payment.

21. How do I object to the Settlement?

If you do not exclude yourself from the Class, you can object to the Settlement if you don't like

any part of it. You can give reasons why you think the Court should deny approval before filing an objection. To object, you must file a letter or brief with the Court stating that you object to the Settlement in *Tapia-Rendon v. Employer Solutions Staffing Group II, LLC, et al.*, Case No. 21-cv-3400, no later than February 25, 2026. Your objection must be e-filed or delivered to the Court at the following address:

Clerk of the United States District Court for the Northern District of Illinois
Dirksen U.S. Courthouse
219 S. Dearborn St.
Chicago, Illinois 60604

The Objection must be in writing, must be signed, and must include the following information: (1) your full name and current address, (2) a statement that you believe yourself to be a member of the Class, (3) the specific grounds for your objection, (4) all documents or writings that you desire the Court to consider, (5) the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with the preparation or submission of your objection or who may profit from the pursuit of your objection, and (6) a statement indicating whether you (or your counsel) intend to appear at the Final Approval Hearing. If you are represented by a lawyer, he or she must file an appearance or seek *pro hac vice* admission to practice before the Court, and electronically file the objection.

22. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class as a Class Member. Excluding yourself from the Class is telling the Court that you don't want to be a Class Member. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold the Final Approval Hearing at 9:00 a.m. CT on April 28, 2026 before the Honorable Matthew Kennelly, via telephone (dial-in 650-479-3207; access code 2305-915-8729). **Do not come to the Courthouse for the final approval hearing.** 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. 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 attorneys' fees and expenses and the incentive award to the Class Representative.

Note: The date, time, and location of the Final Approval Hearing are subject to change by Court order. Any changes will be posted at the settlement website, www.EasyWorkforceBIPALawsuit.com.

24. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. You are welcome to come to 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 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.

25. 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, (*see* Question 21 above), and intend to appear at the hearing, you must state your intention to do so in your objection.

GETTING MORE INFORMATION

26. How do I get more information?

The website, www.EasyWorkforceBIPALawsuit.com, contains several Court documents that provide additional information about the case. It will be updated with the most current information about the lawsuit as it becomes available. You may also write with questions to the EasyWorkforce BIPA Class Action Administrator, P.O. Box 2790, Baton Rouge, LA 70821-2790. You can call the Administrator at 1-844-917-4405 or Class Counsel at (773) 694-4669.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, THE DEFENDANT, OR THE DEFENDANT'S LAWYERS WITH QUESTIONS ABOUT THE SETTLEMENT OR DISTRIBUTION OF PAYMENTS.