

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Lewis v. Lytx Inc., et al.*, Case No. 3:22-cv-00046-NJR

(United States District Court for the Southern District of Illinois)

**Our Records Indicate You May Be Entitled to a Payment From a Class Action Settlement Because You Drove a Vehicle Within Illinois Equipped with a Lytx DriveCam Event Recorder and Used Lytx's Driver-Facing Machine Vision and Artificial Intelligence (MV+AI) Technology.**

**Visit [www.lytxsettlement.com](http://www.lytxsettlement.com) To File a Claim for Payment**

**Claims Must be Submitted no later than June 25, 2025**

*A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.*

This notice is to inform you that a settlement has been reached in a class action lawsuit claiming that Defendant, Lytx, Inc. ("Lytx"), violated the Illinois Biometric Information Privacy Act ("BIPA") by collecting and storing Settlement Class Members' biometric data through dash cams and using its machine vision and artificial intelligence ("MV+AI") technology. Lytx denies these allegations, any wrongdoing, or that it 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 expense of continuing on in court. The class action lawsuit is called *Lewis v. Lytx Inc., et al.*, Case No. 3:22-cv-00046-NJR, and is pending in the Southern District of Illinois (the "Class Action").

**Am I a Class Member?** Our records indicate you may be a Settlement Class Member. Settlement Class Members are all individuals who, while present in the State of Illinois, operated a vehicle equipped with a Lytx DriveCam® Even Recorder ("DriveCam") and for whom MV+AI was used to predict distracted driving behaviors between October 12, 2016 and January 1, 2025.

**What Can I Get?** If approved by the Court, Lytx will create a Settlement Fund of **\$4,250,000** for the benefit of the Settlement Class. The Settlement Fund will be distributed to Settlement Class Members who file a timely and complete claim on a *pro rata* basis, after deducting any Court-approved attorneys' fees and expenses, service awards for the class representatives, and costs of settlement administration.

**How Do I Get a Payment?** To get a payment, please submit a Claim Form, found at [www.lytxsettlement.com](http://www.lytxsettlement.com), and either postmarked or submitted electronically by June 25, 2025. Claim Forms may be submitted online at [www.lytxsettlement.com](http://www.lytxsettlement.com) or by U.S. mail to the following address: Lytx Settlement Administrator, P.O. Box 709, Baton Rouge, LA 70821. You can also elect to receive your payment by check or electronically by Venmo, Zelle, PayPal, etc. on the Settlement Website.

**What are My Other Options?** You may exclude yourself from the Settlement Class by sending a letter

to the Settlement Administrator no later than May 28, 2025. If you exclude yourself, you cannot get a settlement payment, but you will keep any rights you may have to sue Lytx regarding the issues in the lawsuit. Alternatively, if you remain in the Settlement Class, you may object to the proposed Settlement, and you and/or your lawyer have the right to appear before the Court. Your written objection must be filed no later than May 28, 2025. Specific instructions about how to exclude yourself from, or object to, the Settlement are available at the Settlement Website, [www.lytxsettlement.com](http://www.lytxsettlement.com). If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims against Lytx relating to issues in the Class Action will be released.

**Who Represents Me?** The Court has appointed the law firms of Carney Bates & Pulliam PLLC; Lieff Cabraser Heimann & Bernstein LLP; Milberg Coleman Bryson Phillips Grossman PLLC; Workplace Law Partners, P.C.; Werman Salas P.C., and Nick Larry Law LLC to represent the Settlement Class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

**When Will the Court Consider the Proposed Settlement?** The Court will hold the Final Approval Hearing at 1:30 p.m. on July 24, 2025 at the Federal Building and U.S. Courthouse, 750 Missouri Ave, East St. Louis, IL 62201. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award to each of the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

**How Do I Get More Information?** This notice contains only a summary of the Settlement and the proceedings to date. Additional information is also available at the Settlement Website, [www.lytxsettlement.com](http://www.lytxsettlement.com), or by contacting the Settlement Administrator at 844-789-9500.