LEGAL NOTICE OF CLASS ACTION SETTLEMENT

A Settlement has been reached in a class action lawsuit against Trans Union LLC, ("Trans Union") based on claims that Trans Union included inaccurate information regarding bankruptcy filings on consumer credit reports. The lawsuit is known as *Brooks v. Trans Union, LLC*, Civil Action No. 2:22-cv-00048-KSM (E.D. Pa.).

Plaintiff William Norman Brooks, III has alleged that Trans Union sold consumer credit reports about consumers that contained inaccurate bankruptcy information by including on the credit report a reference to a bankruptcy filing as part of a particular credit account (called a "remark"), where the same credit report does not contain a public record of a bankruptcy court filing. Plaintiff asserts that where there is no publicly available record of a bankruptcy filing within ten years before the date of the credit report, it is inaccurate to report bankruptcy information in this way.

Plaintiff's legal claim is that Trans Union willfully violated a federal law called the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq*. ("FCRA"), by failing to follow reasonable procedures to assure the maximum possible accuracy of the information on these consumer credit reports. Trans Union denies that it violated the Fair Credit Reporting Act or engaged in any wrongdoing. The Court in this case decided that all the legal requirements for a class action were met and ordered that the case move forward as a class action. The Court here has determined that it will likely be able to certify the Settlement Class for purposes of the Settlement and final judgment.

Trans Union has denied and continues to deny Plaintiff's allegations and denies that it has violated the FCRA or that it has engaged in any wrongful acts. Nevertheless, Plaintiff and Trans Union have agreed to resolve the claims of all persons covered by the lawsuit. This group is called the "Settlement Class." The Settlement Class is defined as follows:

> For the period beginning January 6, 2020 to January 31, 2023, all persons residing in the United States and its Territories to whom Trans Union sold a consumer report to a third party which included a bankruptcy remark on a tradeline, but with no reference to a bankruptcy record in the public record section of the same report, and for whom there is no government-held public record of a bankruptcy filing within ten (10) years prior to the date of the report.

According to Trans Union's records, you are a member of the Settlement Class. You may have received notice regarding this case in May or June 2025.

The Settlement Class includes some individuals for whom there was no locatable record of a bankruptcy filing at all, based on social security number searches of public records. These individuals make up the "No Bankruptcy Group." For the rest of the Settlement Class, public record searches identified only bankruptcies that were filed more than ten years before the date of the Trans Union credit report. These individuals make up the "Aged Bankruptcy Group."

Trans Union argues that it was still accurate to report bankruptcy information about members of the Settlement Class. The Court has not decided which side is right about this issue. However, members of the Aged Bankruptcy Group would face additional risks if the case moved forward. Therefore, the members of the No Bankruptcy Group will receive preferred benefits under the Settlement as described below to reflect their better litigation position.

Your group is identified on your Notice, underneath the unique Claim Number and PIN. You can also use this information to log into the settlement website: **www.BrooksBankruptcyClassAction.com**.

To resolve the lawsuit, Trans Union has agreed to pay eight million three hundred ten thousand dollars ($8,310,000) for the creation of a Settlement Fund that will be used for class member payments, administrative costs, attorneys' fees, litigation expenses, and an individual settlement and service award to Plaintiff. If the Court approves the Settlement and the Settlement becomes final and effective, members of the Settlement Class will give up their rights to assert claims against Trans Union related to Trans Union's reporting of bankruptcy remark information on credit reports. A summary of the terms of the Settlement is below – please read it carefully and note the deadlines to take action. You may enter an appearance in the case through an attorney if you so desire. 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	If you are in the **No Bankruptcy Group**, you do not need to submit a claim form to receive an automatic payment of $100. If the Court approves the Settlement and it becomes final and effective, a check will be mailed to the address maintained by Trans Union for you, and you will give up your right to bring your own lawsuit against Trans Union about claims related to inaccurate bankruptcy information reported by Trans Union. If you are in the **Aged Bankruptcy Group, <u>you must make a claim to receive a payment.</u>** If you do not make a Valid Claim as described below, you will not receive any money, and you will give up your right to bring your own lawsuit against Trans Union about claims related to inaccurate bankruptcy remark reporting. You may update and/or confirm your address with the Settlement Administrator at the settlement website located at **www.BrooksBankruptcyClassAction.com**.
SUBMIT A CLAIM	All Settlement Class Members can make a claim to receive a payment. Members of the **No Bankruptcy Group** can make a claim to receive a higher payment in addition to the automatic payment. Members of the **Aged Bankruptcy Group** <u>**must**</u> make a claim in order to receive money from the Settlement. You must submit your claim form by **October 30, 2026**. You must submit your claim form at **www.BrooksBankruptcyClassAction.com**. The amount of the payments will depend on which group you are in and on the number of claims submitted. You can find out which group you are in on your Notice, or by using the unique Claim Number and PIN on your Notice to log into the website. For the No Bankruptcy Group, the payment to members who submit a Valid Claim is expected to be approximately $1,000. For the Aged Bankruptcy Group, the payment is expected to be approximately $350. These estimates are based upon the typical claims rates in similar cases – the actual payment amounts will depend on the actual claims rates in this case and may be lower or higher. If the Court approves the Settlement and it becomes final and effective, you can choose to receive payment electronically through the website or a check will be mailed to the address listed on the claim form. You may update and/or confirm your address with the Settlement Administrator on the website.
EXCLUDE YOURSELF FROM THE SETTLEMENT	The Court will exclude from the Class any Class Member who requests exclusion in accordance with the terms of the Settlement Agreement. If you are excluded from the Class, you will receive no benefits from the Settlement or the lawsuit. Requesting exclusion is the only option that will retain your right to bring your own lawsuit against Trans Union about the claims described above. If you are not excluded from the Class, you will be bound by the judgment in the case. If you choose to request exclusion, you must do so by **October 30, 2026** and must do so by writing to the Settlement Administrator at the address below. For more information about how to exclude yourself, see **www.BrooksBankruptcyClassAction.com**.
OBJECT	You may object to any of the terms of the Settlement Agreement, including the proposed award of attorneys' fees of up to $2,770,000, the litigation expenses of up to $308,000 and/or the separate individual settlement and service award to Plaintiff of up to $50,000, for his service to the Class and in recognition of his additional individual claims. For more information on these awards, including Class Counsel's request for fees which will be available on **October 16, 2026**, see **www.BrooksBankruptcyClassAction.com**. Your deadline to object is **October 30, 2026**. 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 **www.BrooksBankruptcyClassAction.com**.
GO TO A HEARING	You may speak at the Final Approval Hearing, set for **December 2, 2026** if you submit an objection by **October 30, 2026** and mail in a letter saying that you would like to appear and be heard at the hearing.

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 **www.BrooksBankruptcyClassAction.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 grant final approval to the Settlement. If it does, and any appeals are resolved, benefits will be distributed to members of the Settlement Class who comply with the terms of the Settlement Agreement, and all members remaining in the Settlement Class will be bound by the terms of the Settlement Agreement.

WHAT'S INCLUDED IN THIS NOTICE?

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 lawsuits, the Settlement, and your legal rights.

Judge Karen Spencer Marston, of the United States District Court for the Eastern District of Pennsylvania, is overseeing this case as *Brooks v. Trans Union, LLC*, Civil Action No. 2:22-cv-00048-KSM (E.D. Pa.).

The person who sued—William Norman Brooks, III—is the Plaintiff. Trans Union, LLC ("Trans Union") is the Defendant.

2. What is this case about?

Plaintiff alleges that Trans Union sold consumer credit reports about consumers that contained inaccurate bankruptcy information by including on the credit report a reference to a bankruptcy filing as part of a particular credit account (called a "remark"), where the same credit report does not contain a public record of a bankruptcy court filing. Plaintiff asserts that where there is no publicly available record of a bankruptcy filing within ten years before the date of the credit report, it is inaccurate to report bankruptcy information in this way.

Plaintiff asserts that Trans Union's actions violated section 1681e(b) of the FCRA. Trans Union denies that it violated the FCRA or engaged in any wrongdoing. You can review the complaint and other documents filed in this lawsuit at **www.BrooksBankruptcyClassAction.com**.

3. Why is this a class action?

In a class action lawsuit, one or more people called the "Class Representatives," in this case William Norman Brooks, III, 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 they sued, Trans Union, 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. The judge in this case decided that this lawsuit can proceed as a class action and move towards a trial.

You can read the court orders explaining why the case was allowed to proceed as a class action at **www.BrooksBankruptcyClassAction.com**.

4. Why is there a Settlement?

There has not been a decision in the case about whether Trans Union has violated the law, nor how much money, if any, should be awarded to anyone. Instead, the two sides have agreed to a Settlement that resolves all of the claims.

Trans Union has denied and continues to deny Plaintiff's allegations and denies that it has violated the FCRA or that it has engaged in any wrongful acts. Nevertheless, Trans Union agreed to settle the litigation 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?

The Settlement Class Members include all persons who fall into the class definition. The Settlement Class is defined as:

> For the period beginning January 6, 2020 to January 31, 2023, all persons residing in the United States and its Territories to whom Trans Union sold a consumer report to a third party which included a bankruptcy remark on a tradeline, but with no reference to a bankruptcy record in the public record section of the same report, and for whom there is no government-held public record of a bankruptcy filing within ten (10) years prior to the date of the report.

The Settlement Class includes some individuals for whom there was no locatable record of a bankruptcy filing at all, based on social security number searches of public records. These individuals make up the "No Bankruptcy Group." For the rest of the Settlement Class, public record searches identified only bankruptcies that were filed more than ten years before the date of the Trans Union credit report. These individuals make up the "Aged Bankruptcy Group."

You can find out which group you are in by using the unique Claim Number and PIN on your notice to log into the settlement website located at **www.BrooksBankruptcyClassAction.com**. Class Members may have received notice about this case in May or June 2025.

There are approximately 57,000 members of the Settlement Class. Approximately 21,000 of those members are in the No Bankruptcy Group. Approximately 36,000 of those members are in the Aged Bankruptcy Group.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Trans Union has agreed to establish a Settlement Fund of eight million three hundred ten thousand dollars ($8,310,000), which will be used to make payments to Settlement Class Members, including higher payments to the No Bankruptcy Group. The Settlement Fund will also cover the costs of administering the Settlement, up to $50,000 as an individual settlement and service award to Plaintiff William Norman Brooks, III, up to $2,770,000 in attorneys' fees and up to $308,000 in litigation expenses.

7. How much will my payment be?

The amount you receive in your payment will depend on which group you are in. If you are in the **No Bankruptcy Group**, and you do not exclude yourself from the Settlement, you will receive an automatic payment of $100. You can also submit a claim form to receive an additional higher payment, as described below. Members of the **Aged Bankruptcy Group** **must** make a claim in order to receive money from the Settlement.

The amount of the payments will depend on which group you are in and on the number of claims submitted. For the No Bankruptcy Group, the payment to members who submit a Valid Claim is expected to be approximately $1,000. For the Aged Bankruptcy Group, the payment is expected to be approximately $350. These estimates are based upon the typical claims rates in similar cases – the actual payment amounts will depend on the actual claims rates in this case and may be lower or higher.

You must submit your claim form by **October 30, 2026**. You must submit your claim form at **www.BrooksBankruptcyClassAction.com**.

8. When will I receive my payment?

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 the settlement website for updates.

All Settlement Class Members can update their mailing address on the claim form. 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.

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 Trans Union and each of its members, owners, shareholders, unitholders, predecessors, successors (including, without limitation, acquirers of all or substantially all of Trans Union's assets, stock, units or other ownership interests) and assigns; the past, present, and future, direct and indirect, parents (including, without limitation, holding companies), subsidiaries and affiliates of any of the above; and the past, present and future principals, trustees, partners, insurers, officers, directors, employees, advisors, attorneys, members, owners, shareholders, unitholders, predecessors, successors, assigns, representatives, heirs, executors, and administrators of any of the above (collectively, "Released Parties"), from any and all claims that were asserted in the Litigation or that could have been asserted in the Litigation, including claims under 15 U.S.C. §1681e(b) relating to the reporting of bankruptcies.

Sections 1(ii) and 12 of the Settlement Agreement describe the legal claims that you give up if you remain in the Settlement. You can view the Settlement Agreement on **www.BrooksBankruptcyClassAction.com**.

EXCLUDING YOURSELF FROM THE SETTLEMENT

10. How do I exclude myself from the Settlement?

If you don't want to participate in the Settlement, and you want to keep the right to sue Trans Union on your own about the claims in this case, then you must take steps to request exclusion from the Settlement. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Settlement. If you are not excluded from the Settlement, you will be bound by the judgment in this action.

To request exclusion from the Settlement, you must submit a statement to the Settlement Administrator, directed to "Exclusion Requests – *Brooks v. Trans Union* Settlement Administrator," with the following information:

- Your full name, address, email address, and telephone number;
- A specific 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 **October 30, 2026** to Brooks v. Trans Union, LLC, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486.

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

No. If you do not exclude yourself, you will give up the right to sue Trans Union for the claims that the Settlement resolves. 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":

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 and appear in the case.

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 2022. Class Counsel will request that the Court award attorneys' fees for the time and effort they have spent on this case and for reimbursement of the litigation expenses they have paid up front.

The amount that will be requested by Class Counsel will be $2,770,000 in attorneys' fees, up to $308,000 in litigation expenses, and up to $50,000 as an individual settlement and service award to William Norman Brooks, III. The payment to Mr. Brooks will compensate him for his service to the Class, and also for his separate individual claims in the case for which he is giving a broader release than the Settlement Class.

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 Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

You must also send a copy of your objection to the Settlement Administrator at: Brooks v. Trans Union, LLC, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486.

Your objection must be submitted on or before **October 30, 2026**, and must include:

- The name of this action: *Brooks v. Trans Union, LLC*, Civil Action No. 2:22-cv-00048-KSM (E.D. Pa.);
- 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 of 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 grant final approval to 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 **December 2, 2026 at 10:00 a.m.** at the United States District Court, Eastern District of Pennsylvania, at the James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106. The hearing may be virtual or moved to a different date or time without additional notice, so check **www.BrooksBankruptcyClassAction.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, as well as 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 *Brooks v. Trans Union, LLC*, Civil Action No. 2:22-cv-00048-KSM (E.D. Pa.);
- 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 **November 18, 2026**, to the addresses in Question 15 above. You must also send copies of the notice to Class Counsel and Defendant's Counsel.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

All Class Members who do nothing will give up the right to sue Trans Union for the claims that the Settlement resolves.

If you are a member of the **No Bankruptcy Group**, and you do nothing, you will still receive a $100 payment. If you are a member of the **Aged Bankruptcy Group**, and you do nothing, you will not receive any benefits from the Settlement.

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 **www.BrooksBankruptcyClassAction.com**. You also may write with questions to the Settlement Administrator at Brooks v. Trans Union, LLC, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486, or call the toll-free number, **(888) 279-4003. Please do not contact Trans Union or the Court for information.**