

**If you were the subject of an Automobile Crash Report
a Proposed Class Action Settlement may affect your rights.**

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

- There is a Proposed Settlement in a class action lawsuit that claims certain companies violated the Driver's Privacy Protection Act ("DPPA"). The companies that were sued have denied the claims.
- The DPPA regulates how persons may obtain, use or disclose personal information like a name, address or driver's license number in records kept by Departments of Motor Vehicles.
- You are included in the Proposed Settlement if at any time from January 12, 2012 through and including the date this Court enters the Final Judgment (described further below), your personal information (including a driver identification number, name, address, or telephone number) appeared on an automobile crash report and that crash report was available for purchase via an online service supported, owned or operated by or on behalf of PoliceReports.US, LLC or LexisNexis Claims Solutions Inc.
- **Whether you act or not, your legal rights are affected by the Proposed Settlement. Your rights and options – and the deadlines to exercise them – are explained in this notice. Please read this notice carefully in its entirety.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS PROPOSED SETTLEMENT		
YOUR RIGHTS AND OPTIONS	WHAT THEY MEAN	DEADLINES
If You Want to OBJECT	Write or send an email to the Court (through the Settlement Administrator) about why you don't like the Proposed Settlement. To find out how to object, please read Paragraph 14.	Postmarked or received on or before May 3, 2021
If You Want to GO TO A HEARING	Ask to speak in Court about the fairness of the Proposed Settlement. For more information, please read Paragraphs 14-17.	Postmarked on or before May 17, 2021
If You DO NOTHING	You are not required to take any action to receive the benefits of the Proposed Settlement. If the Proposed Settlement is finally approved, you will be bound by the Court's Final Judgment and the release of claims explained in the Settlement Agreement.	

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Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

BASIC INFORMATION

1. What is this case about?

If at any time from January 12, 2012 through and including the date the Court enters the Final Judgment, your personal information (including a driver identification number, name, address, or telephone number) appeared on an automobile crash report and that crash report was available for purchase via an online service supported, owned or operated by or on behalf of PoliceReports.US, LLC or LexisNexis Claims Solutions Inc., you are a member of the Class.

This notice informs you about the Proposed Settlement and your rights. The Proposed Settlement will be finally approved after any objections or appeals are resolved. If the Proposed Settlement is finally approved, you will benefit from the relief provided by the Proposed Settlement. Once the Proposed Settlement is final, you will also be bound by the release and other provisions of the Proposed Settlement.

This notice is only a summary of the Proposed Settlement. More details about the Proposed Settlement, the Effective Date, the deadlines, and your options are available in a longer document called the Settlement Agreement. You can get a copy of the Settlement Agreement by visiting www.dppacrashreportsettlement.com.

The lawsuit is known as *Deloris Gaston, et al. v. LexisNexis Risk Solutions Inc., et al.*, No. 5:16-cv-00009-KBD-DCK. It is pending in the United States District Court for the Western District of North Carolina, and Judge Kenneth D. Bell is in charge of this lawsuit. The people who sued are called “Plaintiffs.” The companies they sued are called “Defendants.” The Defendants are PoliceReports.US, LLC (“PRUS”), LexisNexis Risk Solutions Inc. (“LNRS”), LexisNexis Claims Solutions Inc. (“LN Claims”), and LexisNexis Coplogic Solutions Inc. (“LN Coplogic”).

2. What is this lawsuit about?

Plaintiffs claim that Defendants disclosed automobile crash reports to third parties such as law firms and automobile repair shops who used the reports for marketing and solicitation purposes without the Plaintiffs’ consent in violation of the DPPA. The Defendants deny that they did anything wrong.

After years of litigation, the parties agreed to this Proposed Settlement to avoid the costs and risks of trial.

3. Why is this a class action?

Class actions try to bring similar claims in one case in one court. In a class action, the plaintiffs who bring the case are called “Class Representatives” or “Named Plaintiffs.” They have their names listed in the title of the case. They sue on behalf of people who have similar claims — called the “Class” or “Class Members” — which in this case may include you. The Class Representatives filed this case as a proposed class action. When the parties reached this Proposed Settlement, the Court had already decided that the case would be a class action, although the Court certified a class with fewer class members than what the Parties proposed here.

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4. Why is there a Proposed Settlement?

The Court has entered an Order resolving many but not all of the issues in the case. Rather than pursue an appeal of the Court's decision and continue the case, both sides agreed to a nationwide class-action settlement to avoid the costs and risks of further litigation.

The Class Representatives and the lawyers representing the Class think the Proposed Settlement is best for all Class Members. The Court in charge of this lawsuit has given its preliminary approval to this Proposed Settlement, and ordered this notice be published to explain it.

WHO IS IN THE PROPOSED SETTLEMENT?

5. How do I know if I am part of the Proposed Settlement?

You're covered under the Settlement if your personal information (including a driver identification number, name, address, or telephone number) appeared on an automobile crash report and that crash report was available for purchase via an online service supported, owned or operated by or on behalf of PoliceReports.US, LLC or LexisNexis Claims Solutions Inc. at any time between January 12, 2012 and the date the Court enters the Final Judgment.

The Court has decided that everyone who fits the following description is a Class Member:

All persons who: (i) at any time within the four years prior to the date the Complaint was filed through the date of Final Judgment, (ii) had his or her personal information (including a driver identification number, name, address, or telephone number) appear on a Crash Report, and (iii) that Crash Report was available for purchase via an online solution supported, owned or operated by or on behalf of PoliceReports.US, LLC or LexisNexis Claims Solutions Inc.

The Court also decided the everyone who fits the following description is included in a Subclass within the Class:

All persons who: (i) are members of the Rule 23(b)(2) Settlement Class, and (ii) whose Crash Report was prepared by the CMPD.

"CMPD" refers to the Charlotte-Mecklenburg Police Department in North Carolina.

"Crash Report" means an automobile crash report prepared by a law enforcement agency.

"Final Judgment" is the date when the Court issues an order finally approving the Settlement Agreement.

6. Are there exceptions to being included?

Plaintiffs' and Defendants' attorneys and Defendants' employees are excluded from the Class. The presiding judge in the action and his staff, and all members of their immediate families are also excluded from the Class.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

7. What if I am still not sure if I am included in the Class?

If you are still not sure whether you are included in the Class, you can call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com for more information.

THE PROPOSED SETTLEMENT BENEFITS

8. What benefits does the Proposed Settlement provide?

The Proposed Settlement benefits for Class Members fall under the category of “injunctive relief.” An injunction is when a court orders a person to do or not to do something. The Settlement Agreement provides that the court will enter a Final Judgment which requires the Defendants at their expense to change certain business practices when they disclose Crash Reports. All Class Members will receive the benefit of these changes in business practices.

The Defendants have agreed to change business practices including:

- prohibiting the use of Crash Reports purchased on the eCommerce Web Portal for marketing and solicitation uses;
- eliminating the monthly subscription service on the eCommerce Web Portal;
- limit the disclosure of Crash Reports to only when one of the following three conditions are met: (1) Defendants have redacted certain personal information on the Crash Report, (2) Defendants have obtained the consent of the person whose personal information appears on the Crash Report, or (3) the Crash Report is being disclosed only for a purpose permitted by the Final Judgment;
- maintain records identifying each person or entity that receives a Crash Report on the eCommerce Web Portal and the specific permitted purpose for which the Crash Report will be used; and
- implement employee and education training regarding this injunctive relief and the DPPA.

“eCommerce Web Portal” is an online website previously owned by Defendant PRUS and is currently owned by Defendant LN Claims that provides the public access to Crash Reports on behalf of law enforcement agencies.

Because these procedures are being accomplished through a Court injunction, Judge Bell will retain ongoing supervision and enforcement of these changes. The specific terms of these changes are included in the Settlement Agreement.

There will be no monetary payments to Class Members other than the service award payments made to the Named Plaintiffs.

Defendants have agreed to pay all costs associated with implementing the procedures described in the Court’s injunction, administering the Settlement, and paying up to \$5.13 million to Plaintiffs’ lawyers for their attorneys’ fees and expenses and \$10,000 to each Named Plaintiff.

Class Members do not have to pay or buy anything to benefit from the changes in business practices provided by the Settlement Agreement.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

9. When will the Proposed Settlement go into effect?

The Court will hold a final approval hearing on May 24, 2021 at 10:00 a.m., to decide whether to approve the Proposed Settlement. Even if the Court approves the Proposed Settlement, there could be appeals. The time for an appeal varies and could take more than a year.

The Effective Date is the date when all appeals are completed, and the Proposed Settlement becomes final. You can visit the Class Settlement Website at www.dppacrashreportsettlement.com, after May 24, 2021, to check on the progress of the Court-approval process.

The injunctive-relief procedures will remain in effect for seven years from the Effective Date. For the CMPD Settlement Subclass, the injunctive-relief procedures will remain in effect indefinitely unless Defendants seek relief from the Court. During that time, the Court will continue to oversee the injunctive relief and will have the power to enforce the terms of the Settlement Agreement.

10. How does the Proposed Settlement affect my rights?

If the Proposed Settlement is finally approved by the Court, you will be giving up the right to file a lawsuit against any of the Defendants or their related companies for equitable relief (which includes injunctive relief as discussed above) or punitive damages relating to any violation of the DPPA or any similar state law about the claims covered by this Settlement. You will be giving up all such claims, whether or not you know about them. You also will be giving up the right to bring a class action or mass action about the claims in this case, or claims that could have been brought in this case.

However, you will still have the right to file an individual lawsuit in your home jurisdiction against any of the Defendants for either liquidated damages or for actual money damages that you claim resulted from any Defendants violating the DPPA or any similar state law about the claims covered by this Settlement. **The precise terms of the release are explained in Section 4.5 of the Settlement Agreement, which you can view on the Class Settlement Website, www.dppacrashreportsettlement.com.**

The Court's order will apply to you even if you objected or have any other claim, lawsuit, or proceeding pending against any of the Defendants. If you have any questions about the release, you should visit www.dppacrashreportsettlement.com for more information, or consult with a lawyer.

11. Can I choose not to be in the Proposed Settlement?

No. The Proposed Settlement requires the Defendants to implement procedures for enhancing compliance with the DPPA in a way that benefits all Class Members equally. As explained above, this type of remedy is "injunctive." Therefore, under this type of class action, you cannot exclude yourself from the Class or this Proposed Settlement.

But, as explained above, you still have the right to file an individual lawsuit against any of the Defendants for either liquidated damages or for actual money damages under the DPPA.

THE LAWYERS REPRESENTING YOU

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

12. Do I have a lawyer in this case?

Yes. The Court approved the following individuals to represent you and other Class Members:

- David M. Wilkerson and Larry S. McDevitt of the Van Winkle Law Firm, in Asheville, North Carolina;
- Eugene C. Covington, Jr. of Eugene C. Covington, Jr., P.A., in Greenville, South Carolina; and
- Christopher L. Cogdill of Christopher L. Cogdill, P.A. in Greenville, South Carolina.

These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid? What will the Class Representatives receive?

Class Counsel will ask the Court to approve attorneys' fees and expenses of \$5.13 million, for the time and effort they have spent on this case. Defendants will pay the fees approved by the Court in the time and manner explained in the Settlement Agreement.

The two Named Plaintiffs will also ask the Court to approve a payment of \$10,000 as a service award to each of them.

Defendants will pay the approved amounts, and no Class Member will owe or pay anything for these attorneys' fees or service awards.

OBJECTING TO THE PROPOSED SETTLEMENT

14. How do I tell the Court if I don't agree with the Proposed Settlement?

If you're a Class Member, you can object to the Proposed Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To object, you must mail an objection letter or send an email message to the Settlement Administrator to info@dppacrashreportsettlement.com or

Gaston v LexisNexis Risk Solutions
PO Box 23680
Jacksonville, FL 32241

Your letter must be postmarked or received by **May 3, 2021**.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

Your objection letter must include all of the following:

- The name of the case: *Deloris Gaston, et al. v. LexisNexis Risk Solutions Inc., et al.*, Case No. 5:16-cv-00009 (W.D.N.C.);
- Your name, address, and telephone number;
- A general statement of your objection and a summary of the reasons for your objection;
- Copies of any documents on which you base your objection (although documents are not required); and
- A statement of whether you or your lawyer will ask to appear at the final approval hearing to talk about your objections.

If you or your lawyer asks to appear at the final approval hearing, in addition to providing the above information, you must do the following:

- Generally identify the points you wish to speak about at the hearing;
- Enclose copies of any documents you intend to rely on at the hearing;
- State the amount of time you request for speaking at the hearing; and
- State whether you intend to have a lawyer speak on your behalf.

If you intend to have a lawyer present, your lawyer must enter a written notice of appearance of counsel with the Clerk of Court no later than **May 17, 2021**.

If you do not follow the process outlined above, you may not, in the discretion of the Court, be allowed to object, appear at the final approval hearing, or appeal the final approval of the proposed Settlement, the dismissal of the case, the Court's award of attorneys' fees and expenses to Class Counsel or any service awards to the Named Plaintiffs.

THE COURT'S FINAL APPROVAL HEARING

15. When and where will the Court decide whether to finally approve the Proposed Settlement?

The Court will hold a final approval hearing to decide whether to approve the Proposed Settlement. You may attend and you may ask to speak, but you don't have to do either one.

The final approval hearing will be on **May 24, 2021, at 10:00 a.m.**, before Judge Bell, in the United States District Court for the Western District of North Carolina, 200 West Broad Street, Statesville, NC 28677, in Judge Bell's Courtroom

Do not write or call the judge or the clerk concerning this notice or this case.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

At this hearing, the Court will consider whether the Proposed Settlement is fair, reasonable, and adequate. If there are timely and proper objections, the Court will consider them. The Court will listen to people who have asked for and been granted permission to speak at the hearing.

The Court may also decide at the hearing how much to award Class Counsel and the Named Plaintiffs. After the hearing, the Court will decide whether to finally approve the Proposed Settlement. There may be appeals after that. We do not know how long these decisions will take.

The Court may change the date of the final approval hearing without further notice to the Class. You should check the website, www.dppacrashreportsettlement.com, for updates on the hearing date, the court-approval process and the Effective Date.

16. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. You may also pay your own lawyer to attend, but it is not necessary. If you want to have a lawyer appear on your behalf at the final approval hearing, your lawyer must enter a written notice of appearance with the Clerk of the Court no later **May 17, 2021**, and must comply with all of the requirements explained in Question 14.

If you send an objection, you don't have to come to Court to talk about it. As long as you mailed or emailed your written objection on time and complied with the other requirements for a proper objection, the Court will consider it.

17. May I speak at the hearing?

You or your lawyer may ask the Court for permission to speak at the final approval hearing. To do so, you must tell the Court in your objection letter that you or your lawyer would like to speak at the hearing as explained in Question 14.

IF YOU DO NOTHING

18. What happens if I do nothing at all?

You are not required to do anything to get the benefit of the injunctive relief. If the Proposed Settlement is finally approved, you will be bound by the Court's Final Judgment and the release of claims explained in the Settlement Agreement.

GETTING MORE INFORMATION

19. How do I get more information?

This notice is only a summary of the Proposed Settlement. More details about the Proposed Settlement, the Effective Date, the deadlines, and your options are available in a longer document called the Settlement Agreement.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com

You can get a copy of the Settlement Agreement by visiting www.dppacrashreportsettlement.com. The website also contains answers to common questions about the Proposed Settlement, plus other information to help you determine whether you are a Class Member. In addition, some of the key documents in the case will be posted on the website. If you would like this notice or the Settlement Agreement mailed to you, please call 800-842-4612, email the Settlement Administrator at info@dppacrashreportsettlement.com, or write to

Gaston v LexisNexis Risk Solutions
PO Box 23680
Jacksonville, FL 32241

Do not write or call the judge or any court personnel concerning this lawsuit or notice.

Questions? Call toll-free 800-842-4612 or visit www.dppacrashreportsettlement.com