

## LEGAL NOTICE OF CLASS ACTION SETTLEMENT

A Settlement has been reached in a class action lawsuit asserting Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”) violations against Trans Union, LLC (“Trans Union”) based on the claim that Trans Union did not conduct a reasonable investigation of disputes of hard inquiries in credit files, or in the alternative, did not remove the disputed hard inquiries from credit files. Specifically, Plaintiff Duane Norman, Sr. asserts that, after he disputed to TransUnion that his credit report was obtained by a company without a permissible purpose, Trans Union did not contact that company nor did it remove the hard inquiry he disputed. Instead, Trans Union mailed to Mr. Norman and the other class members, including you, a “502 Letter.”

Plaintiff’s legal claim is that Trans Union violated a federal law called the FCRA. Plaintiff alleges that Trans Union acted in the same way with respect to other individuals, called the “Class.” The lawsuit is known as *Norman v. Trans Union, LLC*, Civil Action No. 2:18-cv-05225-GAM (E.D. Pa.). On August 14, 2020, the Court decided that the case will go forward as a class action.

Trans Union has denied and continues to deny Plaintiff and the Class’s allegations or that it that it has violated the FCRA or engaged in any wrongful acts. Nevertheless, Plaintiff and Trans Union have agreed to resolve the claims of a group of consumers defined as:

All consumers with an address in the United States and its territories to whom Trans Union sent its “502 Letter” in response to a written dispute of an inquiry from December 5, 2016 to January 31, 2025.

Some Settlement Class Members received a notice regarding this case in March 2021, after the Court ordered that the case will proceed as a class action.

To resolve the lawsuit, Trans Union has agreed to make changes to its practices for handling disputes and/or challenges of hard inquiries and to pay \$23 million for the creation of a Settlement Fund that will be used for class member payments, administrative costs, attorneys’ fees, litigation expenses, and a service award to Plaintiff. A summary of the terms of the settlement is below – please read it carefully and note the deadlines to take action. There is more detailed information about the case and settlement following the summary.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>DO NOTHING AND RECEIVE A CHECK</b>	<p>If you do not exclude yourself from the Settlement, you will receive a settlement payment automatically. The amount of the payment is expected to be approximately \$20-30, depending on the number of claims submitted.</p> <p>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 the inquiry you disputed with Trans Union.</p> <p>You may update and/or confirm your address with the Settlement Administrator at the case website located at <a href="http://www.transuniondisputeaction.com">www.transuniondisputeaction.com</a>.</p>

<b>MAKE A CLAIM TO RECEIVE A HIGHER PAYMENT</b>	If you experienced certain harms as a result of Trans Union’s alleged violation of the law, you can make a claim for a higher payment on the case website located at <a href="http://www.transuniondisputeaction.com">www.transuniondisputeaction.com</a> . The higher payment will be calculated based on how many valid claims are received and is expected to be up to \$160.00. <b>You must submit a claim by JUNE 24, 2025.</b>
<b>EXCLUDE YOURSELF FROM THE SETTLEMENT</b>	You may exclude yourself from the Settlement if you wish. In doing so, you will receive no benefits from the lawsuit. This is the only option that will retain your right to bring your own lawsuit against Trans Union about the claims described below. You must request exclusion by <b>JUNE 24, 2025</b> . For more information about how to exclude yourself, see the case website located at <a href="http://www.transuniondisputeaction.com">www.transuniondisputeaction.com</a> .
<b>OBJECT</b>	You may object to any of the terms of the settlement agreement, including the proposed award of attorneys’ fees and expenses of up to \$7,966,667.00, and/or the separate service award to the Plaintiff of \$50,000.00. More information on these awards is available at the case website located at <a href="http://www.transuniondisputeaction.com">www.transuniondisputeaction.com</a> , including Class Counsel’s request for fees which will be available on <b>June 10, 2025</b> .  Your deadline to object is <b>JUNE 24, 2025</b> . 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 go to the case website located at <a href="http://www.transuniondisputeaction.com">www.transuniondisputeaction.com</a> .
<b>GO TO A HEARING</b>	You may speak at the final approval hearing if you submit an objection by <b>June 24, 2025</b> and mail in a letter saying that you would like to appear and be heard at the hearing. The final approval hearing will be on <b>Monday, July 21, 2025, at 10 a.m., in Courtroom 9-B of the United States District Court, Eastern District of Pennsylvania, U.S. Courthouse, 601 Market Street, Philadelphia, PA.</b>

**ADDITIONAL CASE DETAILS**

The Court has not decided which side is right. Trans Union has denied and continues to deny Plaintiff and the Class’s allegations or that it that it has violated the FCRA or engaged in any wrongful acts. The Court has preliminarily approved the proposed settlement agreement (available at <https://www.transuniondisputeaction.com>) to which the parties have agreed (the “Settlement”). A hearing is scheduled for **July 21, 2025** to decide whether to approve the Settlement and whether to approve Class Counsel’s request for attorneys’ fees and expenses. If you received a written or email notice about the settlement, it is because you are a member of the following Settlement Class according to Trans Union’s records:

All consumers with an address in the United States and its territories to whom Trans Union sent its “502 Letter” in response to a written dispute of an inquiry from December 5, 2016 to January 31, 2025.

**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.transuniondisputeclaimaction.com](http://www.transuniondisputeclaimaction.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 approve the Settlement. If it does, and any appeals are resolved, benefits will be distributed to members of the Settlement Class.

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## **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 lawsuit, the Settlement, and your legal rights.

Judge Gerald A. McHugh, of the United States District Court for the Eastern District of Pennsylvania, is overseeing this case, *Norman v. Trans Union, LLC*, Civil Action No. 2:18-cv-05225-GAM (E.D. Pa.). The person who sued—Duane Norman, Sr.—is the Plaintiff. Trans Union, LLC (“Trans Union”) is the Defendant.

### **2. What is this case about?**

Plaintiff Duane Norman, Sr. has alleged that after he submitted a dispute to Trans Union that his credit report was obtained without a permissible purpose, Trans Union did not contact the company that requested the credit report, nor did it remove the notation (called a “hard inquiry”) that he disputed. Instead, Trans Union mailed to Mr. Norman and the other class members, including you, a “502 Letter” that stated in part:

“The inquiries listed on your credit report are a record of the companies that obtained your credit information. The identity of each company by trade name and contact information is provided. All inquiries remain on your credit report for two years. Credit information may be requested only for the following permissible purposes: credit transactions, employment consideration, review or collection of an existing account or other legitimate business need, insurance underwriting, government licensing, rental dwelling, or pursuant to a court order. Your written authorization may not be required to constitute permissible purpose. If you believe that an inquiry on your credit report was made without a permissible purpose, then you may wish to contact the creditor directly, by phone or in writing, regarding its purpose.”

Plaintiff asserts that Trans Union’s actions violated sections 1681i(a)(i) and 1681i(a)(ii) of the FCRA.

You can review the complaint and other documents filed in this lawsuit at [www.transuniondisputeaction.com](http://www.transuniondisputeaction.com).

### **3. Why is this a class action?**

In a class action lawsuit, one or more people called the “Class Representative,” in this case Duane E. Norman, Sr., 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 he 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 Court decided that this lawsuit can proceed as a class action and move towards a trial.

More information about why the Court is allowing this lawsuit to proceed as a class action is found in the Court’s Opinion and Order certifying the Class, which is available at [www.transuniondisputeaction.com](http://www.transuniondisputeaction.com).

#### **4. Why is there a Settlement?**

The Court has not decided whether Trans Union has violated the law, nor how much money, if any, should be awarded to the class. Instead, the two sides have agreed to a Settlement.

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

If you received notice of the Settlement from a postcard or email addressed to you, then according to Trans Union's records, you are a member of the Settlement Class: All consumers with an address in the United States and its territories to whom Trans Union sent its "502 Letter" in response to a written dispute of an inquiry from December 5, 2016 to January 31, 2025.

There are approximately 485,000 members of the Settlement Class.

### **THE SETTLEMENT BENEFITS**

#### **6. What does the Settlement provide?**

##### **Practice Changes**

As a result of the Settlement, Trans Union has agreed to implement changes to its practices for handling consumer disputes and/or challenges of hard inquiries, including monitoring the volume of consumer hard inquiry disputes and/or challenges for patterns, and triggering further action by Trans Union when it receives an excessive volume of such disputes and/or challenges related to a particular end user (or "subscriber"). Further action may include requiring the subscriber to recredential, or terminating the subscriber's contract with Trans Union.

##### **Settlement Fund**

Trans Union has agreed to establish a Settlement Fund of twenty-three million dollars (\$23,000,000.00), which will be used to make payments to all Settlement Class Members, including higher payments to Settlement Class Members who submit a Claim Form attesting to damages. The Settlement Fund will also cover the costs of administering the settlement, a \$50,000.00 service award to Plaintiff Duane Norman, and up to \$7,666,667.00 in attorneys' fees and up to \$300,000.00 in litigation expenses.

#### **7. How much will my payment be?**

The amount of payments to Settlement Class Members will depend on how many Settlement Class Members make a claim for a higher payment. All Settlement Class Members will receive a minimum payment of \$20.00-\$30.00, without the need to make a claim.

## **8. When will I receive my payment?**

If the Court approves the Settlement and it becomes final, then payments will automatically be sent by mail to the address maintained by Trans Union for each Settlement Class Member. Settlement Class Members can update their mailing address at [www.transuniondisputeaction.com](http://www.transuniondisputeaction.com). 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.

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 this website for updates.

## **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 asserted in the Complaint under FCRA at 15 U.S.C. §§ 1681i(a)(1) and (2) relating to the dispute of an inquiry. Class members’ right to seek relief under the FCRA for other claims or not involving an inquiry will be preserved.

Section 12 of the Settlement Agreement, which can be found at the case website [www.transuniondisputeaction.com](http://www.transuniondisputeaction.com) describes the legal claims that you give up if you remain in the Settlement.

## **10. How do I exclude myself from the Settlement?**

### **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you don’t want benefits from 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 opt out of the Settlement. This is called excluding yourself—or it is sometimes referred to as “opting out” of the Settlement.

To exclude yourself from the Settlement, you must submit a statement to the Settlement Administrator with the following information:

- Your full name, address, e-mail address, and telephone number;
- A 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 **JUNE 24, 2025**, via email to [info@transuniondisputeaction.com](mailto:info@transuniondisputeaction.com) or via mail to:

Norman v Trans Union, LLC  
c/o Settlement Administrator  
PO Box 23489  
Jacksonville, FL 32241

**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”:

James A. Francis  
John Soumilas  
Lauren KW Brennan  
Jordan Sartell  
FRANCIS MAILMAN SOUMILAS, P.C.  
1600 Market Street, Suite 2510  
Philadelphia, PA 19103

Cary L. Flitter  
Andrew M. Milz  
Jody T. López-Jacobs  
FLITTER MILZ PC  
450 N. Narberth Avenue, Suite 101  
Narberth, PA 19072

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.

**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 2018. Class Counsel will request that the Court award attorneys’ fees and expenses for the time and effort they have spent on this case.

The amount that will be requested by Class Counsel will be \$7,666,667.00 in attorneys’ fees, up to \$300,000.00 in litigation expenses, and up to \$50,000.00 for a service award to Duane Norman Sr. More information on these awards, including Class Counsel’s request for fees which will be available on June 10, 2025, on the case website located at [www.transuniondisputeaction.com](http://www.transuniondisputeaction.com).

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  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

You must also send a copy of your objection to the Settlement Administrator at:  
Norman v Trans Union, LLC  
c/o Settlement Administrator  
PO Box 23489  
Jacksonville, FL 32241

Your objection must be submitted on or before **JUNE 24, 2025**, and must include:

- The name of this Action *Norman v. Trans Union, LLC*, Case No. 2:18-CV-05225
- 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 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 approve 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 **Monday, July 21, 2025, at 10 a.m., in Courtroom 9-B of the United States District Court, Eastern District of Pennsylvania, U.S. Courthouse, 601 Market Street, Philadelphia, PA.** The hearing may be virtual or moved to a different date or time without additional notice, so it is a good idea to check [www.transuniondisputeclaimaction.com](http://www.transuniondisputeclaimaction.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, the request for attorneys’ fees and expenses. We do not know how long these decisions will take. No. Class Counsel will answer any questions the Court may have. But you may attend the hearing

#### **17. Do I have to 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 *Norman v. Trans Union, LLC*, Case No. 2:18-CV-05225);
- 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 **JUNE 24, 2025**, to the addresses in Question 15 above.

## **IF YOU DO NOTHING**

### **19. What happens if I do nothing at all?**

If you do nothing, you will receive the benefits to which you are entitled under this Settlement, which includes a payment of at least \$20.00 as well as Trans Union's agreement to make the changes to its business practices as explained in Section 6.

## **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.transuniondisputeclaimaction.com](http://www.transuniondisputeclaimaction.com). You also may write with questions to the Settlement Administrator via email to [info@transuniondisputeclaimaction.com](mailto:info@transuniondisputeclaimaction.com) or via mail at:

Norman v Trans Union, LLC  
c/o Settlement Administrator  
PO Box 23489  
Jacksonville, FL 32241

**Please do not contact Trans Union or the Court for information.**