

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LISA HILL-GREEN,

Plaintiff,

Civil Action No. 3:19-cv-00708-MHL

v.

EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendant.

JOINT MOTION FOR APPROVAL OF MODIFICATION TO POSTCARD NOTICE

The Parties, by Counsel, seek the Court's approval to replace Exhibit 2 to the Settlement Agreement with the attached modified document. The modified notice is the postcard notice that will be sent to members of the Ruel 23(b)(3) class who disputed or inquired about a non-residential or high-risk address indicator. As modified, the notice clarifies to members of the Disputes Class that they can make a claim based on the nature and impact of their prior dispute, as opposed to the nature of the address identified by Experian which they disputed. Members of the Disputes Class are aware of their previous dispute as well as the address they disputed, and the Parties believe that the proposed edit to the Claim Form will clarify the basis for their class membership and any potential claim they might file, while omitting extraneous information that may cause confusion.

The Administrator has reviewed and approves of this change.

Dated: November 1, 2022

By: /s/ Kristi C. Kelly
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Respectfully submitted,

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Inc.*

Consumers Affected by High-Risk or Non-Residential Addresses on Experian Credit Reports

Could Get Money from a Class Action Settlement

Eligible consumers could receive a payment from a \$22,450,000 Settlement with Experian.

Para una notificación en Español, llamar _____ o visitar www.FraudShieldSettlement.com

Settlement Admin Address

First-Class
Mail
US Postage
Paid
Permit #__



Postal Service: Please do not mark barcode

Notice ID: «Claimant ID»
Confirmation Code: «Code»
«First1» «Last1»
«C/O»
«Addr1» «Addr2»
«City», «St» «Zip»

What's this Case About? The lawsuit claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Am I Included? Based on Experian's records, you have been identified as a Settlement Class Member because between June 20, 2018 and July 31, 2021, you submitted ~~an address a dispute or inquiry~~ to Experian regarding a non-residential or high-risk address indicator, while your Experian credit report contained a high risk or non-residential Fraud Shield Indicator. ~~Experian reported the following address on your report as non-residential:~~ **INSERT**.

What does the Settlement Provide? The Settlement establishes a \$22,450,000 Settlement Fund for payments to Eligible Class Members after payments of attorneys' fees and expenses (not to exceed one third of the Settlement Fund), the Class Representative service payment of \$10,000, and administrative and notice costs. The Parties estimate you could receive between \$ [REDACTED] and \$ [REDACTED], but this is just an estimate and is not guaranteed. The Settlement also establishes substantial and comprehensive changes to Defendant's business practices that will benefit all Class Members.

How Do I Get a Payment? You must submit a valid claim form attesting to the nature of your dispute and that you were harmed by [REDACTED]. Complete and mail in the attached claim form or file a claim online at www.FraudShieldSettlement.com.

Your Other Rights. Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Experian yourself, you must exclude yourself from the Settlement by **Month 00, 2022**. If you stay in the Settlement but do not agree with the terms, you may object to it by **Month 00, 2022**.

The Court will hold a hearing on **Month XX, 2022** to consider whether to approve the Settlement, a request for attorneys' fees and expenses, and service payments. You or your lawyer may appear and speak at the hearing at your own expense.

For more information: Call [REDACTED] **or visit** www.FraudShieldSettlement.com

Claim Form

INSERT MAIL MERGE

Name/Address Change

To receive a payment, you must sign below and postmark your claim by [REDACTED] or file a claim online at www.FraudShieldSettlement.com by [REDACTED].

Please confirm the following statement by checking the box:

- I submitted a dispute to Experian about my address being reported as non-residential and I was harmed by Experian's reporting of a Fraud Shield Indicator.

I declare the information above is correct.

Signature: _____

Name: _____

Phone Number: _____

Email: _____

SSN (last 4): _____

Your check will be sent to the same address as this postcard. To change the mailing address for your check, write the new address above or go to www.FraudShieldSettlement.com.

RETURN ADDRESS FOR CLAIM FORM