

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Angela Brewer v. JustPlay, et al.*

Case No. 2025LA000230

Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois

**IF YOUR BIOMETRIC INFORMATION WAS IMPROPELY OBTAINED BY THE JUSTPLAY APP, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO A CASH PAYMENT.**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with JustPlay GMBH d/b/a/ JustPlay and Gimica GMBH d/b/a GIMICA Games (“JustPlay” or “Defendants”) in a class action lawsuit. This case is about the allegedly improper way in which JustPlay collected, stored, and used the biometric information of people who used the JustPlay mobile app. The case alleges that JustPlay violated Illinois’ Biometric Information Privacy Act, also known as BIPA.
- The lawsuit is called *Angela Brewer v. JustPlay, et al.*, Case No. 2025LA000230. It is pending in the Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois (the “Litigation”).
- JustPlay denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- JustPlay's records indicate that you are a Settlement Class Member, and entitled to a payment under the Settlement.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>SUBMIT A CLAIM</b>	<p>The only way to receive a payment from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.JustPlayBIPASettlement.com">www.JustPlayBIPASettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.</p>	<b>March 16, 2026</b>
<b>OPT-OUT OF THE SETTLEMENT</b>	You can choose to opt-out of the Settlement and not receive a payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	<b>March 2, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not opt-out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for a Settlement payment.	<b>March 2, 2026</b>
<b>DO NOTHING</b>	Unless you opt-out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved and released by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

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## Basic Information

### 1. Why was this Notice issued?

The Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Angela Brewer v. JustPlay, et al.*, Case No. 2025LA000230. It is pending in the Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the companies she sued, JustPlay GMBH d/b/a/ JustPlay and Gimica GMBH d/b/a GIMICA Games, are called the “Defendants.”

### 2. What is this lawsuit about?

This case is about the allegedly improper way in which JustPlay collected, stored, and used the biometric information of people who used the JustPlay mobile app. The case alleges that JustPlay violated Illinois’ Biometric Information Privacy Act, also known as BIPA.

### 3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who opt out from the settlement. In this proposed Settlement, the Class Representative is Angela Brewer. Everyone included in this Action are the Settlement Class Members.

### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendants are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. The Plaintiff and their attorneys think the Settlement is best for all Settlement Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class this way: “All living Illinois citizens whose Biometrics were collected, captured, possessed, used, transmitted, disseminated, stored, or otherwise obtained by Defendants via the JustPlay Application without prior written consent.”

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all people who are officers, directors, or governing board members of the Defendants, governmental entities, and the Court, the Court’s immediate family, and Court staff; and (2) anyone who validly excludes themselves from the Settlement.

If you are not sure whether you are a Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@JustPlayBIPASettlement.com](mailto:info@JustPlayBIPASettlement.com)
- Call toll free, 24/7: 1-833-647-8940
- By mail: JustPlay BIPA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at [www.JustPlayBIPASettlement.com](http://www.JustPlayBIPASettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

All Settlement Class Members may claim a one-time **\$15.00** cash payment. You do not have to provide any proof or explanation to claim this payment. If the total dollar amount of all Valid Claims, Settlement Administration Costs, and Court-approved attorneys fees and costs, and the Service Award is greater than the Settlement Amount, the Cash Payment amount will decrease pro rata on an equal percentage basis so that the maximum payment by Defendants is the Settlement Amount (\$4,500,000).

If you have questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@JustPlayBIPASettlement.com](mailto:info@JustPlayBIPASettlement.com)
- Call toll free, 24/7: 1-833-647-8940
- By mail: JustPlay BIPA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

### 8. What claims am I releasing if I stay in the Settlement Class?

If you stay in the Settlement Class, you won’t be able to be part of any other lawsuit against JustPlay about the issues that this Settlement covers. The “Releases” section of the Settlement Agreement (Section XIII)

describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at [www.JustPlayBIPASettlement.com](http://www.JustPlayBIPASettlement.com).

## **Submitting a Claim Form for a Settlement Payment**

### **9. How do I submit a claim for a Settlement benefit?**

The fastest way to submit your Claim Form is online at [www.JustPlayBIPASettlement.com](http://www.JustPlayBIPASettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

JustPlay BIPA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-647-8940, by email [info@JustPlayBIPASettlement.com](mailto:info@JustPlayBIPASettlement.com), or by U.S. mail at the address above.

### **10. Are there any important Settlement payment deadlines?**

If you are submitting a Claim Form online, you must do so by **March 16, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than **March 16, 2026**.

### **11. When will the Settlement benefits be issued?**

The Court will hold a Final Approval Hearing on **March 31, 2026 (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

Please be patient.

## **The Lawyers Representing You**

### **12. Do I have a lawyer in the case?**

Yes, the Court has appointed attorneys Gary Klinger of Milberg Coleman Bryson Phillips Grossman PLLC and Jeff Ostrow of Kopelowitz Ostrow P.A., to represent you and other Settlement Class Members ("Class Counsel").

### **13. Should I get my own lawyer?**

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

### **14. How will Class Counsel be paid?**

Class Counsel will ask the court to approve \$1,687,500.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by JustPlay.

Class Counsel will also ask for a Service Award Payment of \$2,000.00 for the Class Representative. The Service Award Payment will also be paid by JustPlay.

## Opting Out from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called an Opt-Out Request.

If you opt-out, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you opt-out. However, you will keep any rights you may have to sue JustPlay on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **March 2, 2026**.

To be valid, your Opt-Out Request must have the following information:

- (1) the name of the Litigation: *Angela Brewer v. JustPlay, et al.*, Case No. 2025LA000230, pending in the Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Opt-Out Request” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Opt-Out Request to the Settlement Administrator at:

JustPlay BIPA Settlement  
ATTN: Opt-Out Request  
P.O. Box 25226  
Santa Ana, CA 92799-9958

Your Opt-Out Request must be submitted and postmarked by **March 2, 2026**.

## Objecting to the Settlement

### 16. How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have opted-out from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Litigation: *Angela Brewer v. JustPlay, et al.*, Case No. 2025LA000230, pending in the Circuit Court for the Seventh Judicial Circuit, Sangamon County, Illinois;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) the objector's full name, mailing address, telephone number, and email address (if any);
- (4) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- (5) the number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;
- (6) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs and Service Award;
- (7) the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- (8) the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- (9) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (10) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- (11) the objector's signature (an attorney's signature is not sufficient).

For your objection to be considered, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **March 2, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator, Class Counsel, and Defendant's Counsel.

Clerk of the Court	Settlement Administrator
Clerk of the Court [Court Address]	JustPlay BIPA Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958
Class Counsel	Counsel for Defendants
Jeff Ostrow <b>Kopelowitz Ostrow P.A.</b> 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301	Joel Griswold <b>Baker &amp; Hostetler LLP</b> One North Wacker Drive, Ste. 3700 Chicago, Illinois 60606

### 17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## The Court's Final Approval Hearing

### 18. When is the Court's Final Approval Hearing?

The Court will hold a Final Approval Hearing on **March 31, 2026 at 10:30 a.m. Eastern Time**, in Room [Court Room] of the United States District Court for the District of Connecticut, at [Court Address].

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award to the Class Representative. The Court will also consider any timely objections to the Settlement.

If you are a Settlement Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check [www.JustPlayBIPASettlement.com](http://www.JustPlayBIPASettlement.com) for updates.

### 19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### 20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## Getting More Information

### 21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.JustPlayBIPASettlement.com](http://www.JustPlayBIPASettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:



- Email: [info@JustPlayBIPASettlement.com](mailto:info@JustPlayBIPASettlement.com)
- Call toll free, 24/7: 1-833-647-8940
- By mail: JustPlay BIPA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, [Court Address].

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**