

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

ANGELA KEITH,
on behalf of herself and others similarly situated,

Plaintiff,

Case No.: 3:24-cv-729-jdp

HY CITE ENTERPRISES, LLC,

Defendant.

WEBSITE Q&A NOTICE

**This is a notice of a settlement of a class action lawsuit.
This is not a notice of a lawsuit against you.**

If you received an artificial or prerecorded voice call on your cellular telephone from Hy Cite Enterprises, LLC (“Hy Cite”) dba Royal Prestige, between October 22, 2020 and September 10, 2025, and you did not have an account with Hy Cite, you may be entitled to compensation as a result of the settlement in the class action lawsuit captioned:

Angela Keith v. Hy Cite Enterprises, LLC, Case No.: 3:24-cv-729-jdp (W.D. Wis.)

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

**Please read this notice carefully.
It explains your rights and options to participate in a class action settlement.**

What are your legal rights and options?

SUBMIT A TIMELY CLAIM FORM BY JULY 8, 2026	If you are a Settlement Class Member and you submit a timely, valid Claim Form, you will receive a proportionate share of the \$4.75 million Settlement Fund after various expenses are deducted, and you will release claims you may have against Hy Cite related to this case. It is estimated that each claimant will receive between \$600 and \$1,000, depending on the number of participating Settlement Class Members.
DO NOTHING	If you are a Settlement Class Member and you do nothing, you will <u>not</u> receive a share of the Settlement Fund, but you will release claims you may have against Hy Cite related to this case.
EXCLUDE YOURSELF BY JULY 8, 2026	If you are a Settlement Class Member and you exclude yourself from the Settlement, you will <u>not</u> receive a share of the Settlement Fund, and you will <u>not</u> release any claims you have against Hy Cite.
OBJECT BY JULY 8, 2026	If you are a Settlement Class Member, you may object to the Settlement.

Why was this settlement website created?

This is the settlement website for a proposed settlement. The settlement would resolve the lawsuit Angela Keith filed against Hy Cite. Please read this website carefully. It explains the lawsuit, the settlement, and your legal rights, including the process for receiving a settlement check, excluding yourself from the settlement, or objecting to the settlement.

What is this lawsuit about?

Ms. Keith filed a proposed class action lawsuit against Hy Cite, alleging that it violated the Telephone Consumer Protection Act (“TCPA”) by using an artificial or prerecorded voice in connection with calls it placed to cellular telephone numbers of persons who are not its customers or account holders. The TCPA provides for \$500, and up to \$1,500, in damages for violations. However, among other defenses, prior express consent is a complete defense to a TCPA claim. Hy Cite denies the allegations and denies that it violated the TCPA. The Court did not decide who is right or wrong. The parties have agreed to a settlement.

Why is this a class action?

In a class action lawsuit, one or more people, called Class Representatives, file a lawsuit on behalf of a larger group of people who have similar claims. This group is known as the Settlement Class, and the individuals within it are called Settlement Class Members. The Court resolves the claims of all Settlement Class Members, except for those who choose to exclude themselves from the Settlement Class.

Why is there a settlement?

This settlement resolves claims on behalf of the following Settlement Class:

All persons throughout the United States (1) to whom Hy Cite Enterprises, LLC placed a call, (2) directed to a telephone number assigned to a cellular telephone service, but not assigned to a Hy Cite Enterprises, LLC customer or account holder, (3) in connection with which Hy Cite Enterprises, LLC used an artificial or prerecorded voice, (4) from October 22, 2020 through September 10, 2025. Hy Cite has identified more than 22,000 unique telephone numbers with a “wrong number” designation in its records and to which it may have placed a call and used an artificial or prerecorded voice message during the Settlement Class Period

What does the settlement provide?

Hy Cite will establish a Settlement Fund in the amount of \$4.75 million. Out of the Settlement Fund, Hy Cite will pay:

- a. Settlement compensation to the Settlement Class Members;
- b. The costs and expenses of administering the class action settlement;
- c. An award of attorneys’ fees, subject to the Court’s approval;
- d. Costs and expenses incurred litigating this matter, subject to the Court’s approval; and
- e. A service award to Ms. Keith, subject to the Court’s approval.

Each Settlement Class Member who submits a timely and valid Claim Form will be entitled, subject to the provisions of the settlement agreement, to his or her equal share of the Settlement Fund as it exists after deducting:

- a. Costs and expenses of administering the class action settlement, estimated to be \$116,000.
- b. Attorneys’ fees in an amount not to exceed 36% of the net Settlement Fund after deducting costs and expenses, subject to the Court’s approval.
- c. Costs and litigation expenses not to exceed \$15,000, subject to the Court’s approval; and
- d. A service award for Ms. Keith, not to exceed \$15,000, subject to the Court’s approval.

How can you get a payment?

You must mail a valid Claim Form, postmarked by **July 8, 2026**, to *Keith v. Hy Cite Enterprises, LLC*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391. Or you must submit a valid claim through this [Contact Form](#), by the same date. If you did not receive a Claim Form in the mail but you believe you are a Settlement Class Member,

you must provide to the Claims Administrator evidence of having received from Hy Cite one or more calls with an artificial or prerecorded voice during the Settlement Class Period, and attest to the fact that you are not or were not a customer of Hy Cite when you received these calls. Upon the provision of such evidence, the Claims Administrator can then send a Claim Form for you to complete. More information can be found in the settlement agreement, which is available on the settlement [Contact Form](#).

When will you be paid?

If the Court grants final approval of the settlement, settlement payments will be sent to Settlement Class Members who timely submitted valid Claim Forms no later than 30 days after the judgment in the lawsuit becomes final, unless additional time is necessary to comply with IRS regulations. If there is an appeal of the settlement, payment may be delayed by the appeal.

What rights are you giving up in this settlement?

Unless you exclude yourself from the settlement, and if you meet the Settlement Class definition, you will be considered a member of the Settlement Class, which means you give up your right to sue or continue a lawsuit against Hy Cite over the Released Claims. Giving up your legal claims is called a release. Unless you formally exclude yourself from the settlement, you will release your claims against Hy Cite. For more information on the release, Released Parties, and Released Claims, you may obtain a copy of the class action settlement agreement on the settlement Contact Form, or through Public Access to Court Electronic Records (PACER).

How can you exclude yourself from the settlement?

You may exclude yourself from the settlement, in which case you will not receive a payment. If you wish to exclude yourself from the settlement, you must mail a written request for exclusion to the Claims Administrator, postmarked by July 8, 2026, to:

Keith v. Hy Cite Enterprises, LLC
c/o Kroll Settlement Administration LLC
PO Box 225391
New York, NY 10150-5391
Your request for exclusion must include:

- a. Your full name;
- b. Your address;
- c. Your cellular telephone number that was called by Hy Cite using an artificial or prerecorded voice;
- d. A statement attesting that, when you received a call from Hy Cite, you were not a Hy Cite customer; and
- e. A clear and unambiguous statement that you wish to be excluded from the settlement, such as:

“I request to be excluded from the settlement in the Keith v. Hy Cite action.”

You must sign the request personally. If any person signs on your behalf, that person must attach a copy of the power of attorney authorizing that signature.

When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Fairness Hearing on October 6, 2026, at 12:30 p.m. Central Time. The hearing will take place in the United States District Court for the Western District of Wisconsin, 120 North Henry Street, Madison, WI 53703. At the Final Fairness Hearing, the Court will consider whether the settlement is fair, reasonable, and adequate and, if so, whether final approval of the settlement should be granted. The Court will hear objections to the settlement, if any. The Court may make a decision at that time, postpone a decision, or continue the hearing.

Do you have to attend the hearing?

No. You are not required to attend the hearing. But you are welcome to attend the hearing at your own expense. However, you cannot speak at the hearing if you have excluded yourself from the class action settlement. Once you have excluded yourself, the class action settlement does not affect your legal rights.

What if you want to object to the settlement?

If you do not exclude yourself from the settlement, you may object to the settlement if you do not believe it is fair, reasonable, and adequate. If you wish to object, you must mail a written notice of objection, postmarked by July 8, 2026, to the Claims Administrator, Class Counsel, counsel for Defendant, and the Court, at the following addresses:

<u>Claims Administrator:</u> <i>Keith v. Hy Cite Enterprises, LLC</i> c/o Kroll Settlement Administration LLC PO Box 225391 New York, NY 10150-5391	<u>Class Counsel:</u> Michael L. Greenwald Greenwald Davidson Radbil PLLC 5550 Glades Rd., Suite 500 Boca Raton, FL 33431
<u>Defendant’s Counsel:</u> Tanya M. Salman Michael Best & Friedrich LLP One South Pinckney Street Suite 700 Madison, WI 53701	<u>Court:</u> U.S. District Court for the Western District of Wisconsin 120 N. Henry Street Room 320 Madison, WI 53703

Your written objection must include:

- a. Your full name;
- b. Your address;

- c. Documents establishing, or information sufficient to allow the Parties to confirm, that you are a Settlement Class Member, including the cellular telephone number to which Hy Cite placed an artificial or prerecorded voice call during the Settlement Class Period;
- d. A statement of the specific objection(s).
- e. A description of the facts underlying each objection, including any documents you would like the Court to consider;
- f. A description of the legal authorities that support each objection;
- g. A statement indicating whether you intend to appear at the Final Fairness Hearing and wish to be heard; and
- h. Your signature.

By when must you enter an appearance?

Any Settlement Class Member who objects to the settlement and wishes to enter an appearance must do so by July 8, 2026. To enter an appearance, you must file with the Clerk of the Court a written notice of your appearance and you must serve a copy of that notice, by U.S. mail or hand-delivery, upon Class Counsel and Hy Cite's attorneys at the addresses in Question 13.

What if you do nothing?

If you do nothing and the Court approves the settlement agreement, you will not receive a share of the Settlement Fund, but you will release any claim you have against Hy Cite related to the allegations in this case. Unless you exclude yourself from the settlement, you will not be able to sue or continue a separate lawsuit against Hy Cite over the Released Claims.

What will happen if the Court does not approve the settlement?

If the Court does not finally approve the Settlement or if it finally approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will receive no benefits, and the lawsuit will continue.

Who are Ms. Keith's attorneys?

Ms. Keith's attorneys are:

Michael L. Greenwald

Greenwald Davidson Radbil PLLC

5550 Glades Road, Suite 500

Boca Raton, FL 33431

The Court has appointed Ms. Keith's attorneys to act as Class Counsel. You do not have to pay Class Counsel. If you want to be represented by your own lawyer and have that lawyer appear in Court for you in this case, you must hire one at your own expense.

Who are Hy Cite's attorneys?

Hy Cite's attorneys are:

Tanya M. Salman
Michael Best & Friedrich LLP
One South Pinckney Street Suite 700
Madison, WI 53701

Paul E. Benson
Michael Best & Friedrich LLP
790 N. Water Street, Suite 2500
Milwaukee, WI 53202

Chelsea T. Zielke
Michael Best & Friedrich LLP
444 W. Lake Street, Suite 3200
Chicago, IL 60607

Before what Court is this matter pending?

Ms. Keith filed her class action lawsuit in the following Court:

United States District Court for the Western District of Wisconsin
120 North Henry Street
Madison, WI 53703

Where can you get additional information?

This website is only a summary of the settlement. All documents filed with the Court, including the full Class Action Settlement Agreement and Release, may be reviewed or copied at the United States District Court for the Western District of Wisconsin. In addition, pertinent case materials, including the settlement agreement and other documents, are available on the Important Documents page of this website.

If you would like additional information about this matter, please call (833) 621-5434 or write to:

Keith v. Hy Cite Enterprises, LLC
c/o Kroll Settlement Administration LLC
PO Box 225391
New York, NY 10150-5391

Please do not call the Judge or the Clerk of Court about this case. Neither the Judge nor the Clerk of Court will be able to give you advice about this case. Furthermore, neither Hy Cite nor Hy Cite's attorneys represent you, and they cannot give you legal advice.