

**Subject: Important notice of your rights in a class action settlement – Scroggins v. LexisNexis Risk Solutions FL Inc.**

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**If You were Reported as Deceased on a LexisNexis Risk Solutions FL Inc. 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 HAVE BEEN IDENTIFIED AS A PRODUCT MEMBER***

A Settlement has been reached in a class action lawsuit involving death records reported by LexisNexis Risk Solutions FL Inc. (“LexisNexis FL” or “Defendant”). You could receive a cash payment from a \$13,500,000 Settlement.

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DO NOTHING</b>                                | You will remain a member of the Settlement Class BUT WILL NOT receive a cash payment. You will give up rights to ever sue Defendant and other related parties about the legal claims that are in or could have been brought in this lawsuit, and any claims under the Fair Credit Reporting Act or its state law equivalents.                                                                                                                                                                   |
| <b>SUBMIT A CLAIM FORM</b>                       | If you truthfully submit a Claim Form to affirm or swear that you are the person identified in this Notice and you are alive, YOU WILL receive a cash payment as explained in this Notice. You will give up rights to ever sue Defendant and other, related parties about the legal claims that are in or could have been brought in this lawsuit, and any claims under the Fair Credit Reporting Act or its state law equivalents (unless you send a reservation request form as noted below). |
| <b>EXCLUDE YOURSELF</b>                          | You can opt out of the Settlement and you will not be eligible for any benefits, including any cash payments. This is the only option that allows you to keep any rights you have to bring, or to become part of, another lawsuit involving the claims being settled. There is no guarantee that another lawsuit would be successful or would lead to a larger or better recovery than this Settlement.                                                                                         |
| <b>SEND A RESERVATION REQUEST FORM</b>           | If you have an individual claim because you made a dispute of an inaccurate report to LexisNexis FL, you may reserve that claim (assuming it is not otherwise already barred) by submitting a “Reservation Request” form. You will still receive the cash payment if you submit the Reservation Request form, but will also retain your right to bring a new individual lawsuit for an alleged violation of 15 U.S.C. § 1681i for certain damages on your own.                                  |
| <b>OBJECT TO THE SETTLEMENT</b>                  | If you do not exclude yourself from the Settlement, you may write to the Court about why you don’t like the Settlement or why the Court should not approve it.                                                                                                                                                                                                                                                                                                                                  |

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

This Notice is to advise you that a settlement has been reached in a class action lawsuit. Plaintiff Kerry Jennifer Scroggins (“Plaintiff”) sued LexisNexis FL, alleging that it reported that Plaintiff and other consumers were deceased when they were alive. Plaintiff claims these reports violated the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. (“FCRA”).

Defendant denies any claim of wrongdoing and denies that its reports are governed by the FCRA. However, the parties have reached a settlement. This Notice is designed to advise you regarding the terms of that Settlement.

### **2. Why is this a class action settlement?**

In a class action, one or more people called Class Representatives (in this case, Plaintiff Kerry Jennifer Scroggins) sue on behalf of a group or “class” of people who have similar claims. In this case, Plaintiff sued LexisNexis FL and contended that what happened to her also happened to many other people, which are referred to as “Class Members.”

### **3. Who is included in the Settlement?**

This Settlement includes two groups of Class Members known as Contact Members and Product Members.

I. Contact Members are all persons who:

- (1) contacted LexisNexis FL to inquire about a deceased notation on a LexisNexis FL product from August 11, 2017 to November 4, 2025, and
- (2) LexisNexis FL has a record of the inquiry which identifies it as related to or comparable to “deceased,” “death” or “dead.”

II. Product Members are all persons about whom:

- (1) an identity verification and/or fraud prevention transaction was run from August 11, 2017 to November 4, 2025,
- (2) for which LexisNexis FL has a record that the transaction returned a deceased notation,
- (3) LexisNexis FL’s system reflected a deceased notation associated with that person’s identifying information that was received from the national credit reporting agencies, and
- (4) the person is not deceased.

***YOU HAVE BEEN IDENTIFIED AS A PRODUCT MEMBER***

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

LexisNexis FL has agreed to establish a \$13,500,000.00 settlement fund for payments to qualified Rule 23(b)(3) Settlement Class Members, attorneys' fees and costs, service award to the Named Plaintiff, and notice and administration costs. After settlement administration costs, attorneys' fees and costs (capped at 33.33%), and an award to Plaintiff for serving as Class Representative (capped at \$7,500.00) are deducted, the remaining funds will be evenly distributed among all eligible Class Members. Class Members will each receive no less than \$150, and could receive \$1,000 or more, but the precise amount of the payment will depend on the number of Product Members that submit a claim and the Court's decision with respect to a Class Representative award, attorneys' fees and costs.

The amount of the cash payment will be the same for all Class Members: There are approximately 1,700 Contact Members and 59,000 Product Members. The total settlement fund after the payment of attorneys' fees, service award and costs will be divided equally between each Contact Member and each Product Member who submits a Claim Form.

#### **5. How do I get a payment?**

If you are a Product Member, you need to file a Claim Form to receive your Settlement Payment. The deadline to file your Claim Form is **May 15, 2026**. This deadline is subject to change. Please check the settlement website for any changes to the claim filing deadline. A copy of the Claim Form may be found online at [www.DeceasedReportSuit.com](http://www.DeceasedReportSuit.com).

Payments will be made to Class Members after, and only if, the Court grants "final approval" to the Settlement and any appeals are resolved. It is always uncertain whether appeals will be filed and whether they can be resolved—and resolving them can take time. Please be patient. You can visit [www.DeceasedReportSuit.com](http://www.DeceasedReportSuit.com) to check on the progress of the Court-approval process.

#### **6. What am I giving up to receive these benefits?**

If you do nothing, your rights will be affected.

If you do not exclude yourself, you will not be able to sue LexisNexis FL and other released parties for any claim you have before the Effective Date of the Settlement based upon the legal claims that are in or could have been brought in this lawsuit, and any claims under the Fair Credit Reporting Act or its state law equivalents.

Each member of the Rule 23(b)(3) Settlement Class and his or her respective spouses, heirs, executors, administrators, representatives, agents, attorneys, partners, successors, predecessors, assigns, who has not excluded him or herself from the Settlement or submitted a Reservation Request, will be conclusively deemed to have fully, finally, and forever settled, released and discharged all the Released Parties of and from all claims arising before the Effective Date, whether known or unknown, which the Rule 23(b)(3) Settlement Class Member ever had or now

has that were pleaded in the Complaint (including as amended) or that, whether or not pleaded in the Complaint (including as amended), could be predicated on the same allegations, acts, omissions, facts, events, matters, conduct or transactions alleged in the Complaint (including as amended), and any claims under the Fair Credit Reporting Act or FCRA State Equivalents.

You will be releasing or giving up your released claims against each of LexisNexis FL's past and present employees, parents, subsidiaries and affiliate corporations or other business entities (including without limitation LexisNexis Risk Solutions Inc. and LexisNexis Risk Data Management, LLC), members, officers, directors, employees, agents, customers, resellers, vendors, licensors, independent contractors, other contractors, personal representatives, insurers, attorneys and assigns. Vendors, resellers and customers are released solely as to conduct or omissions entirely derivative of claims against LexisNexis FL or other parent, subsidiary or affiliate.

#### **7. Can I keep my right to bring an individual FCRA lawsuit?**

If you want to reserve your right to pursue an individual claim for actual and/or punitive damages for an alleged violation of 15 U.S.C. § 1681i, excluding any claim for statutory damages, and excluding pursuit of that claim on a class action or mass action basis, you must submit a Reservation Request.

If you submit a Reservation Request and also a Claim Form, you will still receive a cash payment from this Settlement and you will still give up (release) other claims covered by this Settlement.

To submit a Reservation Request, you must send either the Reservation Request Form (available at [www.DeceasedReportSuit.com](http://www.DeceasedReportSuit.com)) or a signed letter that includes:

- Your full name
- Your current mailing address
- Your current telephone number
- Your original signature

Send your Reservation Request by mail to the following address:

*Scroggins v. LNRS FL*  
c/o Settlement Administrator  
P.O. Box 16  
West Point, PA 19486

Or by email to: [questions@deceasedreportsuit.com](mailto:questions@deceasedreportsuit.com)

Your Reservation Request must be postmarked (if mailed) or sent (if emailed) no later than March 4, 2026.

## **8. How do I get out of the Settlement?**

If you do not want to receive a payment from this Settlement and instead would prefer to keep all of your rights to file your own lawsuit against Defendant for the claims at issue in this case, you must take steps to exclude yourself from this Settlement. To do this, you must send a letter by mail stating the following or similar: “I want to be excluded from the Settlement Class in *Scroggins v. LNRS FL*.” Be sure to also include your name, your signature, current mailing address, and current telephone number.

You must mail your signed exclusion request so that it is received no later than March 4, 2026, and send it to the following address:

*Scroggins v. LNRS FL*  
c/o Settlement Administrator  
P.O. Box 16  
West Point, PA 19486

Note: If you exclude yourself from this Settlement, the time you have in which to file your own lawsuit (called the “statute of limitations”) will continue to run. Your claim may have already expired.

## **9. Do I have a lawyer in this case?**

The Court has named the following lawyers as Class Counsel:

Leonard Anthony Bennett  
Drew Sarrett  
Consumer Litigation Associates, P.C.  
763 J Clyde Morris Boulevard  
Suite 1-A  
Newport News, VA 23601

If you want to be represented by your own lawyer, you may hire one at your own expense.

## **10. How will the lawyers be paid?**

Class Counsel will ask the Court for an award of up to one-third (33.33%) of the total settlement fund—or attorneys’ fees and costs of no more than \$4,400,000.00. This award is subject to Court approval and will be considered after Class Counsel submits affidavits detailing their experience, litigation expenses, billing rates, and time spent prosecuting the case, among other things.

### **11. How do I tell the Court that I do not like and object to the Settlement?**

If you are a Class Member, you may send a written statement of reasons why you believe the Settlement is unfair or should not be approved by the Court. Written objections must be personally signed and include: (i) each objection you are raising and the specific legal and factual bases for each objection; and (ii) proof that you are a member of the Settlement Class by providing your name, address, and telephone number.

If you are submitting an objection through an attorney, you must also include: (i) the identity, mailing address, email address, fax number, and phone number for your attorney; (ii) a statement of whether you intend to appear at the final approval hearing; and (iii) a written statement detailing the specific basis for each objection.

All evidence and legal support a Class Member wishes to use to support an objection must be sent to the following address by the Objection Deadline of March 4, 2026:

*Scroggins v. LNRS FL*  
c/o Settlement Administrator  
P.O. Box 16  
West Point, PA 19486

### **12. Where and when is the final approval hearing?**

The Court will hold a final approval hearing on March 16, 2026 at 11:00 a.m. Eastern Time to consider whether to approve the Settlement and request for attorneys' fees and service award to Plaintiff in an amount of \$7,500. The hearing will be held in the United States District Court for the Eastern District of Virginia, Richmond Division, 701 E Broad St., Richmond, VA 23219. The purpose of the hearing will be for the Court to determine whether the proposed Settlement is fair, reasonable and adequate. At that hearing the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement. The hearing may be postponed to a later date without notice.

**YOU ARE NOT REQUIRED TO ATTEND THE HEARING, BUT MAY ATTEND IF YOU WISH.**

### **13. How do I get more information?**

This Notice is only a summary of the Settlement. More details about this Settlement, relevant dates, and your rights are available in a longer document called the Settlement Agreement.

You can get a copy of the entire Settlement Agreement by visiting [www.DeceasedReportSuit.com](http://www.DeceasedReportSuit.com). The website also provides answers to commonly asked questions, plus other information, to help you determine whether you are a Settlement Class Member. In addition, some of the key documents in the case will be posted on the website.

You also may write with questions to the Settlement Administrator at *Scroggins v. LNRS FL*, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486, email [questions@deceasedreportsuit.com](mailto:questions@deceasedreportsuit.com), or call the toll-free number, (833) 319-2038.

**PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

**Questions? Call (833) 319-2038, visit [www.DeceasedReportSuit.com](http://www.DeceasedReportSuit.com), or e-mail [questions@deceasedreportsuit.com](mailto:questions@deceasedreportsuit.com)**