

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

NOTICE OF CLASS ACTION SETTLEMENT:

You have received this Notice, because you applied for and were given a conditional offer of employment by Great Lakes Higher Education Corporation (“Great Lakes”) at any time between March 5, 2013 and June 30, 2014. You may be entitled to monetary benefits under this settlement.

THIS NOTICE AFFECTS YOUR LEGAL RIGHTS. PLEASE READ IT CAREFULLY.

This is not a solicitation from a lawyer. A Federal Court has authorized this Notice.

TO:

DATE: April 27, 2016

RE: Settlement of Claims for Alleged Violations of the Federal Fair Credit Reporting Act

- Cory Groshek, an individual who applied for and was given a conditional offer of employment by Great Lakes sued Great Lakes under the Fair Credit Reporting Act (“FCRA”), alleging that Great Lakes used an improper disclosure and authorization form to obtain consumer reports and background checks.
- For settlement purposes, the Court certified this case as a class action on behalf of all individuals in the United States for whom Great Lakes procured, or caused to be procured, a consumer report as part of any employment process (the “Settlement Class”) during the Class Period. The Class Period is between March 5, 2013 through June 30, 2014. This Notice is to inform you about the status of the lawsuit, including your potential right to receive a share of the settlement funds. Your legal rights are affected and you have a choice to make in this action now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
PARTICIPATE IN THE SETTLEMENT	If you do nothing, you will participate in the settlement. You will receive at least \$300.00 in consideration for your participation in the settlement and release of claims. Settlement checks will be mailed by attorneys for the class after the Court gives final approval to the settlement.
EXCLUDE YOURSELF	You will be unable to participate in the Settlement if you choose this

	option, but will retain any rights you may have against Great Lakes regarding the claims in this case. You have 45 days from the date of this Settlement Notice to exclude yourself.
OBJECT	You have 45 days from the date of this Settlement Notice to make an objection. Write the Court about why you do not approve of the Settlement.
ATTEND THE HEARING	You may ask to testify in open Court about the fairness of the Settlement.

Your options are explained in this Notice. Please read it carefully. To exclude yourself from the Settlement you must act before June 11, 2016, 45 days from mailing of this Notice on April 27, 2016.

1. What is this lawsuit about?

On March 5, 2015, the Class Representative (Cory Groshek) filed a lawsuit in the United States District Court for the Western District of Wisconsin on behalf of himself and others similarly situated to him. The lawsuit alleges violations of the FCRA and seeks statutory and punitive damages as well as attorneys' fees and costs.

Specifically, the Class Representative alleged that Great Lakes willfully violated the FCRA by obtaining a consumer report and background check by using an improper disclosure and authorization. The consumer report and background check were obtained for all individuals who received a conditional offer of employment with Great Lakes during the Class Period. Great Lakes denied and continues to deny the allegations in the Lawsuit and contends that its policies and practices regarding obtaining consumer reports and background checks were proper and in compliance with the law at all times. Great Lakes wishes to settle this litigation, however, to avoid costly and time-consuming litigation but does not admit to any wrongdoing or liability.

2. Who is included in the Settlement Class?

The following Settlement Class has been certified: all individuals in the United States for whom Great Lakes procured, or caused to be procured, a consumer report as part of any employment process from March 5, 2013 through June 30, 2014.

3. What are the Benefits and Terms of the Settlement?

To settle this case, Great Lakes has agreed to pay a total amount of no more than \$267,600 in settlement of all claims of the Settlement Class. for all damages associated with claims arising under the FCRA during the Class Period. Great Lakes also has agreed to pay an incentive award to the Class Representative, costs and attorneys' fees; as ordered by the Court. If you do not opt out of the settlement, you shall receive, if the Court approves the Settlement, a payment of at least \$300.00.

If you do not exclude yourself from the settlement, you will be part of the Settlement Class and will release Great Lakes from all claims of any kind whatsoever, that were asserted by the named plaintiff in this action, or could have been asserted (whether known or unknown) that in any way relate to, were asserted by, or could have been asserted by, the Plaintiff regarding the subject matter of the Lawsuit regarding violations of the FCRA. Said release covers the aforementioned claims which accrued between March 5, 2013 and June 30, 2014.

4. Who Are The Attorneys?

The Court appointed the following lawyers as Class Counsel to represent the certified Settlement Class:

Heath P. Straka	Michael J. Modl
Gingras Cates & Luebke, S.C.	Axley Brynelson, LLP
8150 Excelsior Drive	2 E. Mifflin Street, Suite 200
Madison, Wisconsin 53717	Madison, Wisconsin 53703
(608) 833-2632	(608) 257-5661
straka@gcllawyers.com	mmodl@axley.com

Great Lakes' attorneys are:

Michelle Dama
Albert Bianchi
Michael Best & Friedrich LLP
One South Pinckney Street,
Suite 700
Madison, Wisconsin 53703
(608) 283-0118
mldama@michaelbest.com

5. How much are Attorneys' Fees?

Class Counsel has not yet received any payment of fees or any reimbursement of their out-of-pocket expenses related this lawsuit. As part of the Settlement, subject to Court approval, Class Counsel will apply for recovery of their reasonable fees and expenses. Under this Settlement, payment to Class Counsel will not decrease the amount of the settlement to each individual. Participating Class Members will not be required to make any payments to Class Counsel for attorneys' fees or other litigation costs from their individual settlement amounts. Class Members may object to the terms of the Settlement and/or to the Class Counsel's request for attorneys' fees and expenses, pursuant to Paragraph 9(c).

6. What happens if the Court Approves the Settlement?

If the Court approves the proposed Settlement, it will enter a judgment that will dismiss the Litigation with prejudice on the merits as to all Class Members who do not exclude themselves.

This means that Class Members who do not exclude themselves will be barred from bringing their own lawsuits for recovery against Defendant for all claims related to the FCRA that were asserted by the named plaintiff in this action, or could have been asserted (whether known or unknown) that in any way relate to, were asserted by, or could have been asserted by, the Plaintiff regarding the subject matter of the Lawsuit.

Class Members who validly and timely request exclusion from the Settlement, will not release any claims against Great Lakes arising under the FCRA.

7. What happens if the Court does not approve the Settlement?

If the Court does not approve the proposed Settlement, the case will proceed as if no settlement has been attempted.

8. When is the Fairness Hearing?

If you have an objection to the settlement, a fairness hearing will be held to give you an opportunity to voice your objection. The Fairness Hearing will take place on August 18, 2016 at 9:00 a.m. in the United States District Court for the Western District of Wisconsin, located at 120 North Henry Street, Madison, Wisconsin.

9. What are my options regarding the Settlement?

If you are receiving this Notice, you have the following options:

A. **Participate in the Settlement:** If you wish to receive Settlement funds, assuming the Court approves the Settlement, you need take no further action and you will receive a check for at least \$300.00.

B. **Request to be Excluded:** If you wish to be excluded from the Settlement Class, you must submit a request for exclusion. To be effective, the request for exclusion must:

(i) include your full name, address, and telephone number;

(ii) include the date you applied for and/or your dates of employment and job title(s) while you worked for Great Lakes; and,

(iii) specifically state your desire to be excluded from the settlement in *Groshek et al. v. Great Lakes Higher Education Corporation*, Case No. 15-cv-143.

Your request to be excluded must be postmarked by June 11, 2016, 45 days from mailing of this Notice on April 27, 2016 and mailed to Heath P. Straka, Gingras, Cates & Luebke, 8150 Excelsior Drive, Madison, Wisconsin 53717. If you exclude yourself, you will not receive any monies from the Settlement.

Failure to include the required information or to timely submit your request will result in your remaining a member of the Settlement Class and being bound by any final judgment. If you

validly and timely request exclusion from the Settlement Class, you will not be bound by any final judgment, and you will not be precluded from instituting or prosecuting any individual claim you may otherwise have against Great Lakes related to the subject matter of this Lawsuit.

C. **Object:** If you are a Class Member and you do not request to be excluded, you may object to the terms of the Settlement and/or to the Class Counsel's requests for attorneys' fees and expenses. If you object and the Settlement is approved, and you fail to submit a timely valid request to be excluded, you will be barred from bringing your own individual lawsuit asserting claims related to the matters released through this Settlement, and you will be bound by the final judgment and release and all Orders entered by the Court. You may, but need not, enter an appearance through an attorney of your choice. If you do, you will be responsible for your own attorneys' fees and costs.

If you object to the Settlement and/or to the Class Counsel's request for reasonable attorneys' fees and expenses, you must, on or before June 11, 2016, 45 days from mailing of this Notice on April 27, 2016:

(i) file with the Clerk of the United States District Court for the Western District of Wisconsin, and

(ii) serve upon Heath P. Straka, Gingras, Cates & Luebke, 8150 Excelsior Drive, Madison, Wisconsin 53717 (Class Counsel), and Michelle L. Dama, One South Pinckney Street, Suite 700, Madison, Wisconsin 53701-1806 (Defendant's counsel) a written objection including:

(1) your full name, address, and telephone number;

(2) your dates of application and/or employment and job title(s) while you worked for Great Lakes;

(3) a written statement of all grounds for the objection accompanied by any legal support for such objections;

(4) copies of any papers, briefs, or other documents upon which the objection is based;

(5) a list of all persons who will be called to testify in support of the objection;

(6) a statement of whether you intend to appear at the Fairness Hearing; and

(7) your signature, even if you are represented by counsel.

If you intend to appear at the Fairness Hearing through counsel, the objection must also state the identity of all attorneys representing you who will appear at the Fairness Hearing. Settlement Class Members who do not timely make their objections in this manner will be deemed to have

waived all objections and shall not be heard or have the right to appeal approval of the Settlement.

10. Are there more details available?

For additional information you may contact Class counsel Heath P. Straka of Gingras, Cates & Luebke at 608-833-2632, 8150 Excelsior Drive, Madison, Wisconsin 53717, straka@gcllawyers.com; or by visiting the website specifically designed for this website: www.greatlakesfcraclassaction.com.

NO INQUIRIES SHOULD BE DIRECTED TO THE COURT.

Dated: April 27, 2016

BY ORDER OF THE COURT
Clerk of the Court