

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS

**If you are or were an Illinois resident who used Lenses or Filters
offered by Snap between November 17, 2015 and the present,
You May Be Entitled to a Payment from a Class Action Settlement.**

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- Plaintiffs filed a class action complaint alleging that Snap Inc. (the “Defendant”) violated Illinois’ Biometric Information Privacy Act, 740 ILCS 14/1, et seq. (“BIPA”), based on Defendant allegedly collecting and storing biometric identifiers and/or biometric information (collectively, “biometric data”) through the use of the “Lenses” and “Filters” features offered by Snap without complying with BIPA’s requirements.
- A Settlement has been reached in this case and affects the following persons:

All Illinois residents who used Lenses or Filters offered by Snap between November 17, 2015 and the present (the “Class Period”).

- The Settlement, if approved, would provide \$35,000,000 to pay all Settlement Payments to Settlement Class Members, the Service Award to the Class Representatives, the Fee Award, payment of Administrative Expenses, any federal, state, and/or local taxes of any kind (including any interest or penalties thereon) and any and all other fees, costs or expenses.
- Your legal rights are affected whether you act or don't act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	If you are a member of the Settlement Class, you must submit a completed Claim Form to receive a payment. If the Court approves the Settlement and it becomes final and effective, and you remain in the Settlement Class, you will receive a payment. Deadline: NOVEMBER 5, 2022
EXCLUDE YOURSELF	You may request to be excluded from the Settlement and, if you do, you will receive no benefits from the Settlement. Deadline: OCTOBER 6, 2022
OBJECT	Write to the Court if you do not like the Settlement. Deadline: OCTOBER 6, 2022
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	You will not receive a payment if you fail to timely submit a completed Claim Form, and you will give up your right to bring your own lawsuit against Defendant about the Claims in this case.

Questions? Call (844) 939-4343 or visit www.snapillinoisbipasettlement.com

- 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. If it does, and after any appeals are resolved, benefits will be distributed to those who submit qualifying Claim Forms. Please be patient.

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BASIC INFORMATION

1. Why is there a Notice?

A court authorized this Notice because you have a right to know about a proposed Settlement of the class action lawsuit known as *Boone, et al. v. Snap Inc.*, Case No. 2022LA000708, and about all of your options before the Court decides whether to give Final Approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Circuit Court of DuPage County, Illinois is overseeing this case. The persons who sued, Brianna Boone, Ashley McClinton, and K.F.C., a minor, by and through her guardian, Erin Rentfro, are called the “Plaintiffs” or “Class Representatives.” Snap Inc. is the “Defendant.”

2. What is this litigation about?

The lawsuit alleges the Defendant violated Illinois’ Biometric Information Privacy Act, 740 ILCS 14/1, et seq. (“BIPA”), based on Defendant allegedly collecting and storing biometric identifiers and/or biometric information (collectively, “biometric data”) through the use of Defendant’s “Lenses” and “Filters” features without complying with BIPA’s requirements.

Defendant denies all wrongdoing or liability of any kind whatsoever asserted by Plaintiffs or Settlement Class Members in the Litigation. Specifically, Defendant denies that it collects or stores biometrics and, instead, its Lenses and Filters features utilize object recognition. Additionally, the object recognition data is maintained only on a user’s own device and is deleted from the device when a user closes the Snapchat application. Despite Defendant’s belief that it is not liable for the allegations in the Litigation and despite Defendant’s viable defenses to those allegations, Defendant desires to settle the Litigation, and thus avoid the expense and burden of continued litigation of any action or proceeding relating to the matters being fully settled and finally put to rest in this Settlement Agreement.

The Plaintiffs’ Complaint, Class Action Settlement Agreement and Release, and other case-related documents are posted on the Settlement Website, www.snapillinoisbipasettlement.com. The Settlement resolves the lawsuit. The Court has not decided who is right.

3. Why is this a class action?

In a class action, the persons called the “Class Representatives” (in this case, Plaintiffs) sue on behalf of themselves and other people with similar claims.

All the people who have claims similar to the Plaintiffs are Settlement Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a settlement?

The Court has not found in favor of either Plaintiffs or the Defendant. Instead, both sides have agreed to a settlement. By agreeing to the Settlement, the parties avoid the costs and uncertainty of a trial, and if the Settlement is approved by the Court, Settlement Class Members who submit timely and valid claim forms will receive a Settlement Payment, as described in this Notice. Defendant denies all legal claims in this case. Plaintiffs and their lawyers think the proposed Settlement is best for everyone who is affected.

WHO IS PART OF THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class includes the following persons:

Questions? Call (844) 939-4343 or visit www.snapillinoisbipasettlement.com

All Illinois residents who used Lenses or Filters offered by Snap between November 17, 2015 and the present (the “Class Period”).

Excluded from the Settlement Class are: (i) Defendant; (ii) members of the immediate families of any Defendant who is an individual; (iii) any person who was an officer or director of Snap during the Class Period; (iv) any firm or entity in which any Defendant has or had a controlling interest; (v) parents, affiliates, or subsidiaries of Snap; (vi) the legal representatives, agents, heirs, beneficiaries, successors-in-interest, or assigns of any excluded person or entity, in their respective capacity as such; (vii) the Court and staff (and the immediate family of) to whom this case is assigned; (viii) persons who have already released or finally adjudicated their Released Claims; and (ix) any persons or entities who or which exclude themselves by individually submitting a timely and valid request for exclusion according to the opt-out requirements in the Class Notice and that is accepted by the Court.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class or have any other questions about the Settlement, visit the Settlement Website at www.snapillinoisbipasettlement.com or call the toll-free number (844) 939-4343. You also may send questions to the Settlement Administrator at Info@snapillinoisbipasettlement.com.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

The Settlement provides for the establishment of a Settlement Fund in the amount of \$35,000,000.00 (Thirty-Five Million Dollars), to pay for all Settlement Payments to Settlement Class Members, the Service Award to the Class Representatives, the Fee Award, payment of Administrative Expenses, any federal, state, and/or local taxes of any kind (including any interest or penalties thereon) and any and all other fees, costs or expenses.

Each Settlement Class Member who timely files with the Settlement Administrator a valid Claim Form will receive a settlement payment of a pro rata share of the Settlement Fund.

8. How do I file a Claim?

If you are a Settlement Class Member, you must complete and submit a valid Claim Form in order to receive a payment. You may download a Claim Form at the Settlement Website, www.snapillinoisbipasettlement.com or request a Claim Form by calling the Settlement Administrator toll-free at (844) 939-4343 or emailing the Settlement Administrator at Info@snapillinoisbipasettlement.com. To be valid, a Claim Form must be completed fully and accurately signed under penalty of perjury and timely submitted.

You may submit a Claim Form by U.S. mail or file a Claim Form on the Settlement Website. If you send in a Claim Form by U.S. mail, it must be postmarked no later than **NOVEMBER 5, 2022**. If you file a Claim Form on the Settlement Website, then you must do so by **NOVEMBER 5, 2022**.

No matter which method you choose to file your Claim Form, please read the Claim Form carefully and provide all the information required. Only one Claim Form may be submitted per Settlement Class Member.

9. When will I receive my payment?

Questions? Call (844) 939-4343 or visit www.snapillinoisbipasettlement.com

Payments to Settlement Class Members will be made only after the Court grants Final Approval to the Settlement and after any appeals are resolved (*see* “Final Approval Hearing” below). If there are appeals, resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want benefits from the Settlement, and you want to keep the right to sue or continue to sue the Defendant on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself—or it is sometimes referred to as “opting out” of the Settlement Class.

10. How do I get out of the Settlement?

In order to exercise the right to be excluded, a Member of the Settlement Class must timely send an individual, written letter requesting exclusion from Settlement of the Action to the Settlement Administrator and Class Counsel providing: (i) their full legal name; (ii) Snapchat username; (iii) email address; (iv) a personal attestation that they have lived in the state of Illinois for at least 183 days (6 months) during the Class Period, and during the time they lived in Illinois, used Snapchat’s Lenses or Filters; and (v) at least one Illinois address at which they resided during the Class Period.

A request to be excluded that is not sent individually to the required recipients designated in the Class Notice, or that is not postmarked within the time specified, shall be invalid and the person serving such a request shall be considered a Member of the Settlement Class and shall be bound as Settlement Class Members by the Settlement Agreement, if approved.

Settlement Administrator	Class Counsel
Snapchat Privacy Settlement ATTN: Exclusion Request PO Box 58220 Philadelphia, PA 19102	Milberg Coleman Bryson Phillips Grossman PLLC 3833 Central Ave. St. Petersburg, FL 33713

Your letter requesting to be excluded from the Settlement must be personally signed by you under penalty of perjury and contain a statement that clearly indicates your desire to be excluded from the Settlement Class.

Your exclusion request must be postmarked no later than **OCTOBER 6, 2022**. You cannot ask to be excluded on the phone, by email, or at the Settlement Website.

You may opt out of the Settlement Class only for yourself.

11. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up the right to sue the Defendant for the claims that the Settlement resolves. You must exclude yourself from this Settlement Class in order to pursue your own lawsuit.

12. What am I giving up to stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue or be part of any other lawsuit against the Defendant about the issues in this case, including any existing litigation, arbitration, or proceeding. Unless you exclude yourself, all of the decisions and judgments by the Court will bind you.

The Class Action Settlement Agreement & Release is available at www.snapillinoisbipasettlement.com. The Class Action Settlement Agreement & Release provides more detail regarding the Released Claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can talk to the law firm representing the Settlement Class listed in Question 14 for free, or you can, at your own expense, talk to your own lawyer if you have any questions about the Released Claims or what they mean.

13. If I exclude myself, can I still get a payment?

No. You will not get a payment from the Settlement Fund if you exclude yourself from the Settlement.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in the case?

The Court has appointed the following lawyers as “Class Counsel” to represent all Members of the Settlement Class.

Milberg Coleman Bryson Phillips Grossman PLLC
3833 Central Ave.
St. Petersburg, FL 33713

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

15. How will the lawyers be paid?

Class Counsel intends to request up to 35% of the Settlement Fund, or \$12,250,000 as payment for attorneys’ fees, as well as reimbursement out-of-pocket expenses costs in the amounts of \$73,723.09. The Court will decide the amount of fees and expenses to award.

Class Counsel will also request that a Service Award of \$2,000 each be paid to the Class Representatives for their services as representatives on behalf of the Settlement Class.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member (and do not exclude yourself from the Settlement Class), you can object to any part of the Settlement. To object, you must by no later than **OCTOBER 6, 2022**, file your objection with the Clerk of the Court and send copies to the Settlement Administrator, Class Counsel, and Defendant’s counsel.

Court	Defendant’s Counsel
18th Judicial Circuit Court 505 N. County Farm Rd. Room 2016 Wheaton, IL 60187	Morgan, Lewis & Bockius, LLP ATTN: Beth Herrington 110 N. Wacker Drive, Suite 2800 Chicago, IL 60606
Class Counsel	Settlement Administrator
Milberg Coleman Bryson Phillips Grossman PLLC 3833 Central Ave. St. Petersburg, FL 33713	Snapchat Privacy Settlement ATTN: Objections PO Box 58220 Philadelphia, PA 19102

Questions? Call (844) 939-4343 or visit www.snapillinoisbipasettlement.com

Any Settlement Class Member who intends to object to this Settlement must include in any such objection: (i) his/her full name, address, email address, and current telephone number; (ii) the case name and number of the Action; (iii) all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials; (iv) the identification of any other objections he/she has filed, or has had filed on his/her behalf, in any other class action cases in the last four years; and (v) the objector's signature. If represented by counsel, the objecting Settlement Class Member must also provide the name and telephone number of his/her counsel. If the objecting Settlement Class Member intends to appear at the Final Approval Hearing at his/her own expense, either with or without counsel, he/she must state as such in the written objection, and must also identify any witnesses he/she may call to testify at the Final Approval Hearing and all exhibits he/she intends to introduce into evidence at the Final Approval Hearing, which must also be attached to, or included with, the written objection.

17. What is the difference between objecting and asking to be excluded?

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. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses ("Final Approval Hearing").

18. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Final Approval Hearing on **NOVEMBER 17, 2022, at 9:00 A.M.** at the 18th Judicial Circuit Court, 505 N. County Farm Rd., Room 2016, Wheaton, IL 60187. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.snapillinoisbipasettlement.com for updates. At the Final Approval Hearing, the Parties will request that the Court consider whether the Settlement Class should be certified as a class pursuant to 735 ILCS 5/2 for settlement and, if so, (i) consider any properly-filed objections; (ii) determine whether the Settlement is fair, reasonable and adequate, was entered into in good faith and without collusion, and should be approved, and shall provide findings in connections therewith; and (iii) enter the Final Approval Order, including final approval of the Settlement Agreement, and a Fee Award. It is unknown how long these decisions will take.

19. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time and it complies with all the other requirements set forth above, the Court will consider it. You may also pay your own lawyer to attend the hearing, but it is not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing (*see* Question 16 above). You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing, meaning you do not file a timely Claim, you will not get benefits from the Settlement. Further, unless you exclude yourself, you will be bound by the judgment entered by the Court.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Class Action Settlement Agreement & Release, which you can view at www.snapillinoisbipasettlement.com.

You can also contact the Settlement Administrator by mail, email or phone.

MAIL

Snapchat Privacy Settlement c/o Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

EMAIL

Info@snapillinoisbipasettlement.com

PHONE

(844) 939-4343