UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

***Kyles v. Papa John's International Inc., et al.*, Case No. 1:20-cv-07146**

IF YOU WORKED AT A FRANCHISEE-OWNED PAPA JOHN'S RESTAURANT IN ILLINOIS AT ANY TIME FROM DECEMBER 3, 2015 TO DECEMBER 17, 2025 AND USED THE FOCUS SYSTEM'S FINGER SCANNER, YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS-ACTION SETTLEMENT

This is an official court notice. You are not being sued. This is not an ad for a lawyer.

- A settlement has been reached in a class action filed against Papa John's International, Inc. ("Papa John's"). The lawsuit claims that Papa John's violated an Illinois law called the Biometric Information Privacy Act ("BIPA") by capturing, collecting, and possessing biometric data without the proper notice and consent. Papa John's denies any wrongdoing and says that it has not violated any laws. The Settlement does not establish who is right or wrong, but rather is a compromise to end the lawsuit and avoid the uncertainties and expenses that come with continuing in court.

- You may be included in this class action if, between December 3, 2015 and December 17, 2025, you worked at a franchisee-owned Papa John's location and used the FOCUS point-of-sale system's finger scanner. Some exceptions to participating apply. For example, people who reached separate settlement agreements with Papa John's are not included.

- If you submit a valid claim and the Court approves the settlement, the amount you receive as payment will depend on how many other Class Members submit valid claims. All litigation costs, settlement expenses, and legal fees will be separately paid from the settlement fund.

- Please read this notice carefully. Your legal rights are affected whether or not you act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
SUBMIT A CLAIM FORM BY APRIL 17, 2026	**This is the only way to receive payment.** Claim Forms can be found and submitted at the Settlement Website www.PJBipaLawsuit.com. As a member of the Class, you will give up your rights to sue Papa John's in the future regarding the claims in this case.
EXCLUDE YOURSELF BY APRIL 17, 2026	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Papa John's for the claims in this Settlement. If you exclude yourself, you will give up the right to receive any benefits from this Settlement.
OBJECT TO THE SETTLEMENT BY APRIL 17, 2026	You may object to the Settlement and requested attorneys' fees and expenses by writing to the Court and informing it why you don't think the Settlement or the requested attorneys' fees and expenses should be approved. If you object, you may also file a Claim Form to receive a payment, but you will give up the right to sue Papa John's in a separate lawsuit about the legal claims this Settlement resolves.
GO TO THE HEARING ON MAY 26, 2026	You can attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must make a request to do so in your written objection. You are not required to attend the Final Approval Hearing.
DO NOTHING	If you do nothing, you will not receive any payment from the Settlement and you will give up your rights to sue Papa John's regarding the claims in this case.

- 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 and the requested attorneys' fees and expenses. No Settlement payments will be provided unless the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. What is this notice and why should I read it?

A Court authorized this notice to let you know about a proposed settlement with Papa John's. You have legal rights and options that you may act on before the Court decides whether to approve the proposed settlement. You may be eligible to receive a cash payment as part of the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge John Robert Blakey of the United States District Court for the Northern District of Illinois. is overseeing this class action. The case is called *Kyles v. Papa John's International Inc., et al*., Case No. 1:20-cv-07146. The person who filed this lawsuit, Preston Kyles, is the Plaintiff. One of the companies he sued, Papa John's, is a Defendant.

2. What is a class action?

A class action is a lawsuit in which one or more plaintiffs—in this case, Preston Kyles—sue on behalf of a group of people who have similar claims. Together, this group is called a "Class" and consists of "Class Members." In a class action, the court resolves the issues for all class members, except those who exclude themselves from the class. In this case, the Court certified a class for settlement purposes.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

3. What is this lawsuit about?

This lawsuit alleges that Papa John's violated a law called the Biometric Information Privacy Act ("BIPA") by collecting fingerprint data through the FOCUS point-of-sale system's finger-scanning function. That law says companies can't possess, collect, store, or share biometric data, which includes things like face, hand, or fingerprint scans, without first giving notice and getting consent.

Papa John's denies all of the claims in the lawsuit. Papa John's claims that the type of information it collected isn't covered by BIPA, and that it provided the notice and obtained the consent required by BIPA. The Court has not decided who is right.

The Settlement is not an admission of wrongdoing by Papa John's. More information about the complaint in the lawsuit and Papa John's position can be found in the "Court Documents" section of the settlement website at www.PJBipaLawsuit.com.

WHO'S INCLUDED IN THE SETTLEMENT

4. Who is included in the Class?

The Settlement includes anyone who worked at a franchisee-owned Papa John's location in Illinois and used the FOCUS point-of-sale system's finger scanner at any time from December 3, 2015 to December 17, 2025, except for the people specifically excluded from the settlement (see FAQ #5, below).

The Class includes approximately 10,975 people.

5. Who is not included in the Class?

Some users of the FOCUS system's finger scanner in Illinois are excluded from the Class, including people who only worked at corporate-owned Papa John's locations, people who have previously settled their BIPA claims with Papa John's, and people who worked for the judges or lawyers involved in the case. The Settlement Agreement has a list of the categories of people who are excluded.

6. How do I know if I am in the Class?

If you worked at a franchisee-owned Papa John's location in Illinois and used the FOCUS system's finger scanner at any time from December 3, 2015 to December 17, 2025, and you are not subject to any of the exclusions above, then you are a member of the Class and are entitled to a cash payment.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If the Court approves the settlement, Papa John's will pay $2,250,000 to establish a "Settlement Fund." The costs of administering the settlement, Class Counsel's attorneys' fees and costs, and an incentive award to the Class Representative will, if approved by the Court, be paid from the Settlement Fund. The remaining amount will be used to pay Class Members.

If any settlement checks go uncashed, the remaining money will be redistributed to those Class Members who did timely cash their checks. That redistribution will continue until there's no longer enough money left in the Settlement Fund to cover the cost of making further payments, at which point it will be distributed to the Illinois Treasurer's Unclaimed Property Division.

HOW TO GET BENEFITS

8. How do I get payment?

To get a payment, you must submit a Claim Form, which can be found on the Settlement Website, postmarked or submitted electronically by April 17, 2026. Claim Forms may be submitted online at www.PJBipaLawsuit.com or by U.S. mail to the following address: Kyles v Papa John's International Settlement Administrator, PO Box 1428, Baton Rouge, LA 70821. You can elect to receive your payment by check or electronically by ACH, Zelle, Venmo, Paypal, or digital Mastercard on the Settlement Website.

The payment amounts will be determined by each claiming Class Member's *pro rata* share of the Settlement Fund, after deducting any Court-approved attorneys' fees and expenses, service award to the Class Representative, and costs of settlement notice and administration.

9. When Will I get my payment?

The Court will hold a hearing to consider the fairness of the Settlement on May 26, 2026 at 11:00 AM. If the Court approves the Settlement, the Settlement Administrator will distribute the first round Settlement Payments approximately 54 days of the Court finally approving the settlement, or any appeals process completing.

10. I'm still not sure if I'm included.

If you are still not sure whether you are included in the Class, please call the Settlement Administrator at 833-554-2370.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the case?

The Court has appointed Thomas R. Kayes of Loevy + Loevy and J. Dominick Larry of Nick Larry Law LLC as the attorneys to represent the Class. They are called "Class Counsel." In addition, the Court appointed Plaintiff Preston Kyles to serve as the Class Representative. He is a Class Member like you.

12. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel are working on your behalf. You can hire your own lawyer, but you will have to pay that lawyer.

13. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees of one-third of the net settlement fund (i.e., the amount of the fund remaining after payment of notice and administration expenses) and for reimbursement of $13,890.42 in out-of-pocket expenses incurred. Class Counsel will also request an incentive award of $10,000 for the Class Representative.

Class Counsel will file a motion asking for approval of the requested attorneys' fees, expenses, and incentive award no later than April 3, 2026, and that motion will be available for review on the Settlement Website. The Court will determine the proper amount of attorneys' fees and expenses to award Class Counsel and the proper amount of any incentive award to the Class Representative. The Court may award less than the amounts requested.

YOUR RIGHTS AND OPTIONS

14. What happens if I do nothing at all?

If you do nothing, you will be a Class Member, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court, but you won't receive a payment. Unless you exclude yourself, you won't be able to start a lawsuit or be part of any other lawsuit against Papa John's for the claims or legal issues being resolved by this Settlement.

15. What happens if I ask to be excluded?

If you exclude yourself from the Settlement, you will receive no payment under the Settlement, and you will no longer be a Class Member. You will keep your right to start your own lawsuit against Papa John's for the same legal claims at issue in this lawsuit. You will not be legally bound by the Court's judgments related to the Class and Papa John's in this class action.

16. How do I ask to be excluded?

You can mail a letter stating that you want to be excluded from the Settlement. Your letter must: (1) be in writing, (2) identify the case name, "*Kyles v. Papa John's International Inc. et al.*, Case No. 20-cv-07146," (3) state your full name and current address, (4) be physically signed by you or your representative, and (5) be postmarked for delivery by mail to the Settlement Administrator on or before April 17, 2026. Your request to be excluded must also include a statement to the effect that: "I hereby request to be excluded from the proposed Class in *Kyles v. Papa John's International Inc.*" You must mail your exclusion request no later than April 17, 2026 to: *Kyles v. Papa John's International Settlement Administrator, PO Box 1428, Baton Rouge, LA 70821*. You can't exclude yourself over the phone.

17. If I don't exclude myself, can I sue Papa John's for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Papa John's and any other released party for the claims being resolved by this Settlement.

18. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you will not receive a payment.

19. How do I object to the Settlement?

If you do not exclude yourself from the Class, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should deny approval before filing an objection. To object, you must file a letter or brief with the Court stating that you object to the Settlement in *Kyles v. Papa John's International Inc., et al.*, Case No. 20-cv-7146, no later than April 17, 2026. Your objection must be e-filed or delivered to the Court at the following address:

Clerk of the United States District Court for the Northern District of Illinois
Dirksen U.S. Courthouse
219 S. Dearborn St.
Chicago, Illinois 60604

The Objection must be in writing, must be signed, and must include the following information: (1) your full name and current address, (2) a statement that you believe yourself to be a member of the Class, (3) the specific grounds for your objection, (4) all documents or writings that you desire the Court to consider, (5) the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with the preparation or submission of your objection or who may profit from the pursuit of your objection, and (6) a statement indicating whether you (or your counsel) intend to appear at the Final Approval Hearing. If you are represented by a lawyer, he or she must file an appearance or seek *pro hac vice* admission to practice before the Court, and electronically file the objection.

20. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class as a Class Member. Excluding yourself from the Class is telling the Court that you don't want to be a Class Member. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold the Final Approval Hearing at 11:00 AM CT on May 26, 2026 before the Honorable John Robert Blakey, in Courtroom 1203 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representative.

Note: The date, time, and location of the Final Approval Hearing are subject to change by Court order. Any changes will be posted at the settlement website, www.PJBipaLawsuit.com.

22. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. You are welcome to come to the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was filed or mailed on time and meets the other criteria described in the Settlement, the Court will consider it. You may also pay a lawyer to attend, but you don't have to.

23. May I speak at the hearing?

Yes. If you do not exclude yourself from the Class, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement. If you filed an objection, (*see* Question 19 above), and intend to appear at the hearing, you must state your intention to do so in your objection.

GETTING MORE INFORMATION

24. How do I get more information?

The website, www.PJBipaLawsuit.com, contains several Court documents that provide additional information about the case. It will be updated with the most current information about the lawsuit as it becomes available. You may also write with questions to *Kyles v. Papa John's International Settlement Administrator, PO Box 1428, Baton Rouge, LA 70821*. You can call the Administrator at 833-554-2370 or Class Counsel at (773) 694-4669.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, THE DEFENDANT, OR THE DEFENDANT'S LAWYERS WITH QUESTIONS ABOUT THE SETTLEMENT OR DISTRIBUTION OF PAYMENTS.