

**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 between Papa John's International, Inc. ("Papa John's") and workers at franchisee-owned Papa John's restaurants in Illinois. 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. The lawsuit is called ***Kyles v. Papa John's International Inc., et al., Case No. 1:20-cv-07146***, and is pending in the United States District Court for the Northern District of Illinois. Please read this notice carefully. Your legal rights are affected whether or not you act.

*For complete information, visit [www.PJBipaLawsuit.com](http://www.PJBipaLawsuit.com) or call 833-554-2370.*

**Am I included?** Yes, our records indicate that you worked at a franchisee-owned Papa John's location in Illinois within the time period from December 3, 2015 to December 17, 2025. If you used the FOCUS point-of-sale system's finger scanner in Illinois, and you haven't previously settled a lawsuit with Papa John's, then you are part of the Settlement Class.

**What does the settlement provide?** Papa John's has agreed to create a settlement fund of \$2,250,000. 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. Those payment amounts are after the payment of the costs, administrative expenses, legal fees, and any service award from the settlement fund.

**How do I get my payment?** To receive a payment, you must complete and return a Claim Form, no later than April 17, 2026. A link to the Claim Form is included in this Notice, or you can submit a Claim Form online at [www.PJBipaLawsuit.com](http://www.PJBipaLawsuit.com).

**What are my rights and options?** You have a choice of whether to stay in the Class or not. If you do nothing, you are choosing to stay in the Class. This means you will be legally bound by all orders and judgments of the Court and you won't be able to sue or continue to sue Papa John's for the legal claims made in this case in a different lawsuit. If you do not want to stay in the Class, you must submit a request for exclusion. If you exclude yourself, you cannot get any money or benefits from this lawsuit, but you will keep your right to separately sue Papa John's over the legal issues in this case. To ask to be excluded from the Class, send a letter to the Papa Johns BIPA Settlement Administrator, PO Box 1428, Baton Rouge, LA 70821, postmarked by April 17, 2026 saying you want to be excluded from ***Kyles v. Papa John's International Inc., et al., Case No. 1:20-cv-07146***. Include your name, address, and signature. If you don't like something about the Settlement or the requests for attorneys' fees and expenses or the service award, you can tell the Court by submitting 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. 1:20-cv-07146***, no later than April 17, 2026.

If you want to receive a payment under the Settlement, you must submit a Claim Form as described above.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Nick Larry Law LLC and Loevy + Loevy. They represent you and the other Class Members and are called Class Counsel. The lawyers will request to be paid from the total amount that Papa John's has agreed to pay to the Class. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Preston Kyles—a class member like you—to represent the Class.

**When will the Court approve the settlement?** The Court will hold a final approval hearing on May 26, 2026 at 11:00 AM CT 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 Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to one-third of the Net Settlement Fund and an incentive award to Plaintiff Kyles of \$10,000, a copy of which will be posted on the settlement website.

***For more information, visit [www.PJBipaLawsuit.com](http://www.PJBipaLawsuit.com) or call 833-554-2370.***