

**COURT-AUTHORIZED NOTICE OF SETTLEMENT OF COLLECTIVE
ACTION LAWSUIT**

ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781
Telephone: (888) 250-6810
Website: www.technicianclassaction.com
Email: info@ilymgroup.com

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
Case No. 502025CA002300XXXAMB**

If you were engaged as a Technician or Technician Engineer outside the State of California by ADT LLC (“ADT”) between November 18, 2021 and November 30, 2024, you are entitled to a payment from a collective action lawsuit settlement.

A Florida state court authorized this notice. This is not a solicitation from a lawyer.

This Notice explains the lawsuit, the settlement, your legal rights, and what benefits may be available.

- This notice pertains to any ADT Technician or Technician Engineer (collectively “Technicians”), other than a virtual Technician, who was employed by ADT at any time between November 18, 2021 and November 30, 2024. If you are receiving this notice, ADT’s records indicate that you are entitled to participate in the settlement if you choose to do so.
- A former ADT Technician (the “Named Plaintiffs”) has sued ADT, alleging that he was not fully compensated for all time worked. The Named Plaintiff filed the lawsuit as a collective action under the Fair Labor Standards Act (“FLSA”). ADT denies these allegations and maintains that the Named Plaintiff and all other employees were properly compensated at all times. The lawsuit was resolved on a collective basis and the settlement has been approved by the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida.
- To avoid the burden, expense, inconvenience, and uncertainty of continued litigation, the parties have concluded that it is in their best interests to resolve and settle the action by entering into a settlement agreement. Accordingly, the former Technician who filed the lawsuit and ADT have agreed to a settlement. ADT has agreed to pay up to a maximum settlement amount of \$2,500,000.00 (the “Maximum Settlement Amount”) to be allocated among the Named Plaintiff, the Opt-In Plaintiffs and the Class Members, as well as to pay for attorneys’ fees, litigation costs, and the expenses of administering the settlement.
- Under the allocation formula created by the settlement, you are entitled to receive an estimated settlement payment of **\$<<MERGED_ClassAward>>**, half of which is subject to deductions for applicable taxes and withholdings like any other paycheck, and half of which will be considered in settlement of a claim for liquidated damages, penalties and interest. This amount is based on a formula fully set forth in the Settlement Agreement that takes into account the number of weeks worked by you during the relevant time frame. As described more fully below in this Notice, to participate in the settlement and receive a settlement payment, you must return a properly completed Consent Form to the Claims Administrator, postmarked or otherwise received by e-mail or completed electronically no later than July 8, 2025. If you fail to timely return a completed Consent Form, you will not receive a settlement payment.
- Neither Class Counsel nor ADT make any representations concerning tax consequences of this settlement or participation in it, and you are advised to seek your own personal tax advice prior to acting in response to this Notice.
- Your legal rights may be affected. You have a choice to make:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
RETURN THE CONSENT FORM AND RECEIVE A PAYMENT	By timely returning a properly completed Consent Form, you agree to participate in the settlement and release your claims, and will receive an estimated settlement payment of \$<<MERGED_ClassAward>> . You will also release any wage and hour claims you may have against ADT as more fully described below.

**DO NOT
RETURN THE
CONSENT
FORM**

If you do not wish to participate in, or be bound by, the settlement, you should not return the Consent Form. If you do not timely return a completed Consent Form postmarked or otherwise received by e-mail or completed electronically by July 8, 2025 you will not receive a settlement payment nor will you release any wage and hour claims you may have against ADT.

- These rights and options are explained in this notice.
- Payments will be distributed by the Claims Administrator after the close of the notice period. Please be patient.

BASIC INFORMATION

1. Why did I get this notice?

ADT's records show that you were employed as a Technician for ADT at some point in time between November 18, 2021 and November 30, 2024. The Court ordered that you be sent this notice because you have a right to know about the settlement of this collective action lawsuit, and about all your options.

This notice explains the lawsuit, the settlement, your legal rights, and what benefits are available.

The lawsuit was filed in the Circuit Court, Fifteenth Judicial Circuit in and for Palm Beach County, Florida, and that Court has retained jurisdiction over the lawsuit to enforce the terms of this settlement. This lawsuit is known as *Charles Addow, individually and on behalf of all others similarly situated v. ADT LLC*, In the Circuit Court, 15th Judicial Circuit in and for Palm Beach County, Florida, Case No. 502025CA002300XXXAMB.

The person who filed the lawsuit is called the "Named Plaintiff." ADT is called the "Defendant."

2. What is this lawsuit about?

This lawsuit is about whether ADT's Technician's were properly paid overtime for all hours worked. ADT denies that it did anything wrong.

3. What is a collective action?

In a "Collective Action," the "Named Plaintiff" sues on behalf of people who have similar claims. However, other employees who have similar claims do not become part of the Collective Action until they opt into the Collective Action. You may opt into this Collective Action and become a "Class Member" by signing and timely returning the enclosed Consent Form. If you timely return a Consent Form, a settlement check will be mailed to you after the close of the Notice Period.

4. Why is there a settlement?

The Court did not decide in favor of the Named Plaintiff or ADT. Both sides believe they would have prevailed in this case, but there was no decision ruling in favor of either party. Instead, both sides agreed to a settlement. That way, they will all avoid the cost of a trial, the delay of litigating the case and of potential appeals, and the people affected will get compensation. The Named Plaintiff and their attorneys think the settlement is best for all potential Class Members.

WHO IS IN THE SETTLEMENT?

5. How do I know if I will be included in the settlement?

You will receive a settlement check if you worked as an ADT Technician for at least one full week at any time between November 18, 2021 and November 30, 2024, **and** you have signed and returned the enclosed Consent Form by July 8, 2025.

6. I'm still not sure if I will be included

If you are still not sure whether you will be included, you can ask for free help by contacting the Claims Administrator as follows:

ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781
Telephone: (888) 250-6810
Email: info@ilymgroup.com

THE SETTLEMENT BENEFITS – WHAT YOU GET

7. What does the settlement provide?

ADT has agreed to pay up to a total maximum amount of \$2,500,000.00 as a part of the Settlement Agreement. This amount covers payments to participating Class Members, Opt-In Plaintiffs, Class Counsel for attorneys' fees and costs, and the costs of administering the settlement.

8. How much will my payment be?

Based on the formula that has been approved by the Court, if you sign and timely return the enclosed Consent Form, you will receive an estimated settlement payment of \$**<<MERGED_ClassAward>>**, half of which will be considered settlement of a claim for wages and subject to deductions for applicable taxes and withholdings like any other paycheck, and half of which will be considered liquidated damages, penalties and interest. The allocation formula takes into account the number of weeks worked by you during the relevant time period. The Settlement Agreement contains the exact allocation formula. You may obtain a copy of the Settlement Agreement by following the instructions in Paragraph 14 below.

HOW YOU GET A PAYMENT

9. How can I get my payment?

To get your payment, you must return a properly completed Consent Form to the Claims Administrator postmarked or received by e-mail or electronically completed no later than July 8, 2025. If returning by mail, you must return your Consent Form by U.S. mail, and may send it in the enclosed pre-paid envelope to:

ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781
Telephone: (888) 250-6810

If returning by email, the fully completed claim form should be emailed to: info@ilymgroup.com

If you want to complete the claim form online, you can do so at the following website: www.technicianclassaction.com

If you mail or e-mail a properly completed Consent Form to the Claims Administrator or electronically complete the Consent Form by the deadline, you will be sent a settlement check. You will then have ninety (90) calendar days from the date the check is cut to cash/deposit your check. If you do not cash/deposit your check within that ninety (90) calendar day time period, you will not receive another payment, but you will still be bound by the Release.

10. When will I get my payment?

Payments will be distributed by the Claims Administrator after the close of the notice period. Please be patient.

11. What am I giving up to receive a payment?

You will not become a member of the Collective Action unless you return a properly completed Consent Form by U.S. Mail or e-mail or electronically complete the Consent Form by the deadline. Once you submit your Consent Form and are sent a payment, you cannot sue, continue to sue, or be a party in any other lawsuit against ADT LLC, or any of its parent companies, franchisors, partners,

predecessors, successors, affiliates, subsidiaries, directors, managers, members, shareholders, current and past employees, servants, insurers, agents, business partners, representatives, legal representatives and any other person or entity acting on their behalf or who may have allegedly jointly employed you or any of the Class Members during the relevant time period for any FLSA claims for unpaid regular, straight time or overtime wages, any federal, state or local wage and hour or wage payment law claims, all derivative benefit claims (both ERISA and non-ERISA benefits, including 401(k) benefits or matching benefits, retirement benefits, and deferred compensation benefits), any state or local wage and hour or unpaid wages type of claims, quantum meruit claims, interest on any such claims, liquidated damages, penalties, and attorneys' fees and costs related to such claims, and all other available remedies and relief of any kind or nature whatsoever relating to your employment as a Technician from the beginning of time through March 26, 2025. In addition, by submitting a Consent Form, all of the Court's orders will apply to you and legally bind you.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

The Court has decided that the lawyers at the law firm of Morgan & Morgan, P.A. are qualified to represent you and all potential Class Members. These lawyers are called "Plaintiff's Counsel" or "Class Counsel." You will not be charged for these lawyers. You do not need to retain your own attorney in order to participate as a Class Member.

13. How will the lawyers be paid?

The Court has approved payment of one third of the Maximum Settlement Amount for attorneys' fees and litigation costs and expenses. Those fees compensated Class Counsel for investigating the facts, litigating the case, and negotiating the settlement. The cost of the Claims Administrator also will be deducted from the Settlement Amount.

GETTING MORE INFORMATION

14. Are there more details about the settlement?

This notice summarizes the settlement. More details are in the Settlement Agreement. If there are any discrepancies between this notice and the Settlement Agreement, the Settlement Agreement will control. You can get a copy of the Settlement Agreement by sending a request, in writing, to:

ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781
Telephone: (888) 250-6810
Fax: (888) 845-6185
Email: info@ilymgroup.com

15. How do I get more information?

If you have other questions about the settlement, you can contact the Claims Administrator above, or Plaintiff's Counsel at the address and/or telephone number below.

Andrew Frisch
Morgan & Morgan
8151 Peters Rd, 4th Floor,
Fort Lauderdale, FL 33324
afrisch@forthepeople.com
(954) 327-5355