

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

If you received a collection letters from Dynamic Recovery Solutions, LLC, you may benefit from this class action settlement.

The case is titled *Margaret Hussein, on behalf of plaintiff and the class v Dynamic Recovery Solutions, LLC*, No. 18-cv-4400 (NDIL) (“Litigation”). A Federal Court authorized this notice. This is not a solicitation from a lawyer.

**THIS IS A NOTICE OF A SETTLEMENT OF A CLASS ACTION LAWSUIT.
THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

COMPLETE A CLAIM FORM TO RECEIVE A PORTION OF SETTLEMENT PROCEEDS	If you wish to receive a portion of the Class Recovery, you must complete and return the claim form on or before December 3, 2019 .
EXCLUDE YOURSELF	You will receive no benefits, but you will retain your legal claims against the Defendant.
OBJECT	Write to the Court explaining why you don’t like the settlement. You may also appear at the fairness hearing.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	If you do nothing, you will receive no benefits from the settlement and will not retain your legal claims for statutory damages against the Defendant.

1. Why did I get this notice?

You are receiving this notice because you were identified as (a) a person with an Illinois address, (b) to whom a letter was sent by Dynamic to collect a debt, (c) which debt was a credit card on which the last payment had been made more than 5 years prior to the date of the letter, (d) which stated that “The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it,” (e) which did not state that any payment may restart the statute of limitations, and (f) which letter was sent between June 25, 2017 and present.

2. What is the lawsuit about?

The lawsuit claims that Dynamic (“Defendant”) violated the Fair Debt Collection Practices Act (“FDCPA”) when Dynamic sent collection letters to consumers on time-barred debts without disclosing that making a payment on those debts may restart the statute of limitations.

3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case, Margaret Hussein), sue on behalf of a group (or a “Class”) of people who have similar claims. In this case Margaret Hussein brought claims regarding the collection letters sent by Defendant Dynamic in an attempt to collect a debt.

4. Why is there a settlement?

To avoid the cost, risk, and delay of litigation, the parties reached a settlement agreement as to Plaintiff’s and the Class’s claims in the Litigation.

5. How do I know if I am a part of the settlement?

According to Defendant Dynamic’s records, you are a Class Member.

YOUR BENEFITS UNDER THE SETTLEMENT

6. What can I get from the settlement?

The Agreement calls for a total Class Recovery of \$130,000.00 to be divided equally among Class Members who do not exclude themselves and who timely return a valid claim form.

If all 5,237 Class Members return claim forms and remain in the Class, you will be entitled to a check in the amount of approximately \$29.60. Based on Class Counsel’s experience, Class Counsel expects that 10%-20% of the Class Members will submit claim forms resulting in an estimated recovery of \$124.00-\$248.00 per Class Member.

7. When will I receive these benefits?

You will receive these benefits approximately 45-60 days after the Court enters a Final Approval Order. This estimation is premised on the assumption that no objections are received.

8. I want to be part of the settlement and receive benefits. What do I do?

Submit a timely and complete claim form, which is attached hereto, to receive a portion of the settlement funds. The address for claim form submissions is provided below in Section 11.

9. What am I giving up to receive these benefits?

By staying in the Class, all of the Court’s orders will apply to you, and you give Defendant a “release”. A release means you cannot sue or be part of any other lawsuit against Defendant about the claims or issues in the case. This description is general and does not cover the full release language. For a complete statement of all the contentions, proceedings, and settlement terms in this case, you should consult the files relating to this lawsuit, which are available for your inspection at the Clerk of the United States District Court for the Northern District of Illinois, 219 S. Dearborn Street, 20th Floor, Chicago, Illinois, 60604.

10. How much will the Class Representative receive?

The named Class Representative will receive a payment which includes damages for the claim asserted on behalf of the Class, and an incentive award for acting as Class Representative. The total payment to the Class Representative will be \$7,000, which is subject to the Court's Approval.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to receive the benefits of the settlement, but you want to keep your legal claims against the Defendant, then you must take steps to exclude yourself from this settlement.

11. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail which states:

I hereby wish to exclude myself from the settlement in *Margaret Hussein v Dynamic Recovery Solutions, LLC*, No. 18-cv-4400 (N.D. Ill.).

Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request to the Class Administrator so that it is postmarked **no later than December 3, 2019**, to:

**First Class, Inc./ J14168- Hussein
5410 W. Roosevelt Rd., Ste 222
Chicago, IL 60644-1490**

12. If I exclude myself, do I still receive benefits from this settlement?

No, you will not receive anything resulting from the settlement, but you may have the right to sue, or be part of a different lawsuit against Defendant over the claims raised in the Litigation.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

The Court has named the law firms of Wilcox Law Firm, P.C., Uhrich Law, P.C. and Zamparo Law Group, P.C. as Class Counsel. You will not be charged for these lawyers; however, they will receive a payment from Dynamic in an amount to be determined by and approved by the Court, and as set forth below in Paragraph 14. If you want to be represented by your own lawyer, you may hire one at your own expense. If you choose to hire your own lawyer, he or she must file an appearance before **January 8, 2020 at 2 p.m.**

14. How will the lawyers be paid?

Pending the Court's approval, Dynamic will pay Class Counsel no more than \$106,000.00. This payment will be made in addition to the Class Recovery and will not reduce the amount that you or any other Class Member is entitled to receive from the settlement.

CLASS COUNSEL'S VIEWS ABOUT THE SETTLEMENT

15. Is this a fair settlement?

Class Counsel believes that this settlement is fair. The claims asserted on behalf of the Class against Defendant are under the FDCPA. The FDCPA is a federal statute which provides for both individual actions and class actions. In an individual action, the person bringing the suit may recover (i) any actual damages suffered; and (ii) statutory damages of between \$0 and \$1,000.00. In a class action, the maximum possible recovery is (i) any actual damages incurred by the class members and (ii) the lesser of 1% of the debt collector's net worth or \$500,000.00. The Court, in its discretion, may award anything up to the maximum amount to a prevailing party. In either an individual or class action, the person bringing the suit can also recover attorneys' fees and the expenses of prosecuting the suit, if it is successful. Based upon the information provided to Class Counsel and the nature of the claims alleged, Class Counsel believes this is a fair and reasonable settlement.

16. What are the Defendant's views of this settlement?

As stated above, by settling this lawsuit, Dynamic is not admitting that it did anything wrong. Defendant expressly denies the claims asserted by the Plaintiff and denies all allegations of wrongdoing and liability. .

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

17. How do I tell the Court that I do not like the Settlement?

If you are a Class Member, you can object to the settlement. In order to object to the settlement or any part of the settlement, you must send a written statement of each objection being made, a detailed description of the facts underlying each objection, a detailed description of the legal authorities underlying each objection, a statement of whether you intend to appear at the Fairness Hearing and a list of witnesses and exhibits if you intend to present them at the Fairness Hearing. You must include the name and number of the case: *Margaret Hussein v Dynamic Recovery Solutions, LLC*, No. 18-cv-4400 (N.D. Ill.), your name, address, telephone number, and your signature. You must mail your objection so that it is postmarked no later than **December 3, 2019** to:

Clerk of the Court, United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604

You must also send a copy of your objection to **these attorneys**:

Steven J. Uhrich 1 N. State Street, Suite 1500 Chicago, IL 60606	David M Schultz Jennifer W. Weller Hinshaw & Culbertson LLP 151 N. Franklin St., Suite 2500 Chicago, IL 60606
--	---

THE FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend if you wish, but you are not required to do so.

18. Where and when is the fairness hearing?

The Court will hold a Fairness Hearing on **January 8, 2020 at 2 p.m.** in the courtroom of Judge Steven C. Seeger, Room 2319 of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604. The purpose of the hearing will be for the Court to determine whether the proposed settlement is fair, reasonable, and adequate, and in the best interests of the Class, and to determine the appropriate amount of compensation for Class Counsel. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THIS HEARING TO BENEFIT FROM THIS SETTLEMENT. The hearing may be postponed to a later date without notice.

19. How can I get more information?

GETTING MORE INFORMATION – CONTACT:

Steven J. Uhrich
1 N. State Street, Suite 1500
Chicago, IL 60606
p: 773.969.6337
f: 773.496.6968

Para obtener una copia en español de este aviso o para acceder a una copia de este aviso en línea, visite:
HusseinDRSsettlement.com

PLEASE DO NOT CALL, OR OTHERWISE CONTACT, THE JUDGE OR THE COURT CLERK

