

*Simmons v. Motorola Solutions, Inc.*  
Class Action Administrator  
PO Box 2920  
Portland, OR 97208-2920

FIRST-CLASS MAIL  
PRESORTED  
U.S. POSTAGE PAID  
PORTLAND, OR  
PERMIT NO. 2882

COURT AUTHORIZED NOTICE OF CLASS  
ACTION AND PROPOSED SETTLEMENT

YOU MAY BE ENTITLED TO A  
CASH PAYMENT FROM A CLASS  
ACTION SETTLEMENT IF YOUR  
FACE APPEARED IN IMAGES  
THAT WERE PROCESSED USING  
FACESEARCH TECHNOLOGY  
**AND YOU:** (A) ARE OR WERE  
AN ILLINOIS RESIDENT; OR (B)  
WERE PRESENT IN ILLINOIS AT  
THE TIME THE IMAGE(S) WAS  
TAKEN OR PROCESSED

By Order of the Court Dated: April 9, 2025

Claim ID:

This notice is to inform you that a proposed settlement has been reached in a class action lawsuit against Motorola Solutions, Inc. (“Motorola Solutions”) and Vigilant Solutions LLC (“Vigilant”; together with Motorola Solutions, “Defendants”), which provided law enforcement customers with facial recognition technology known as FaceSearch and with access to a gallery of booking photos. The lawsuit alleges that Motorola Solutions and Vigilant violated an Illinois law called the Illinois Biometric Information Privacy Act (“BIPA”) by allegedly collecting, storing, using, and disclosing individuals’ biometric data in connection with providing FaceSearch and access to the booking photo gallery, allegedly without complying with the law’s requirements. The case is *Simmons v. Motorola Solutions, Inc.*, Case No. 2024-L-010142, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division. The proposed Settlement is not an admission of wrongdoing by Motorola Solutions and Vigilant. Motorola Solutions and Vigilant deny that they violated the law. The Court has not decided who is right or wrong.

**Why Am I Being Contacted?** Our records indicate that your face appears in one or more booking photo images that were processed using the Defendants’ FaceSearch technology. You therefore may be eligible to receive cash benefits from this Settlement.

**What Does The Settlement Provide?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The amount of the payment is estimated to be approximately [\$\$\$], but could be more or less depending on the number of valid claims submitted. The amount would be an equal share of a \$47,500,000 fund that Motorola Solutions and Vigilant have agreed to create, after any Court-approved payment of settlement expenses, attorneys’ fees, and incentive awards.

**How Do I Get My Payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.website.com](http://www.website.com), and submit a Claim Form online. You can also call 1-855-688-8844 to request a paper copy of the Claim Form. ***All Claim Forms must be postmarked or submitted online by July 29, 2025.***

**What are My Options?** You can do nothing, comment on or object to any of the settlement terms, or exclude yourself from the settlement. If you do nothing, you won’t be able to sue Motorola Solutions and Vigilant or certain related companies and individuals in a future lawsuit about the claims addressed in the settlement. If you exclude yourself, you won’t get a payment but you’ll keep your right to sue Motorola Solutions and Vigilant on the issues the settlement concerns. You must contact the settlement administrator by mail or e-mail to exclude yourself. You can also object to the settlement if you disagree with any of its terms. ***All Requests for Exclusion and Objections must be received by July 8, 2025.***

**Do I Have a Lawyer?** Yes. The Court has appointed lawyers from the law firm Loevy & Loevy as “Class Counsel.” They represent you and other settlement class members. The lawyers will request to be paid from the total amount that Motorola Solutions and Vigilant paid into the fund. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court has also chosen Irene Simmons and Rodell Sanders—class members like you—to represent the Settlement Class.

**When Will the Court Approve the Settlement?** The Court will hold a final approval hearing on August 20, 2025 at 9:30 am before the Honorable Joel Chupack in Room 2601. The Court will hear objections, determine if the settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 34% of the fund and incentive awards of \$7,500, which will be available on the Settlement Website.