

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DUANE E. NORMAN, SR.,  
on behalf of himself and all others similarly situated,  
*Plaintiff,*  
v.  
TRANS UNION, LLC,  
*Defendant*

Civil Matter No. 18-cv-05225-GAM

**Notification of Pending Class Action Suit**

**YOU ARE NOT BEING SUED**

**You Are a Member of a Class Action Against Trans Union, LLC**

- A class action lawsuit has been filed against the consumer reporting agency Trans Union, LLC (“Trans Union”) to redress how Trans Union handles certain consumer dispute letters.
- Trans Union’s records indicate that you are a member of the following Class certified by the Court:  
For the period beginning December 5, 2016, all persons residing in the United States and its Territories to whom Trans Union sent its “502 Letter” in response to a written dispute of an inquiry.
- There has been no money or benefit recovered to date, and there is no guarantee that there will be money or a benefit available in the future. However, the Court did grant a motion certifying the above Class, and *you have a choice to make now.*

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT**

<b>DO NOTHING</b>	<b>Stay in this lawsuit. Await the outcome. Give up certain rights.</b> By doing nothing, you keep the possibility of getting money or benefits that may come from a trial on damages or a settlement. But, you give up any rights to sue Trans Union individually and to seek damages for the same legal claims that are in this lawsuit. Similarly, if you do nothing and Trans Union wins a trial on damages, you will lose your claims covered by this lawsuit.
<b>ASK TO BE EXCLUDED</b>	<b>Remove yourself from this class action. Get no benefits or money. Keep certain rights.</b> If you ask to be excluded and money or benefits are awarded later, you will not share in that recovery. But, you keep any rights you may have to sue Trans Union separately about the same legal claims that are brought in this lawsuit.

- Your options are explained in this notice. To ask to be excluded, you must act before June 18, 2021.
- The Plaintiff and his lawyers must prove the claims against the Defendant at trial. If money or benefits are awarded or obtained from Trans Union, you will be notified.
- Any questions? Read on or visit ***www.TransUnionDisputeClassAction.com*** or call toll-free 1-(800)-566-0596.

**BASIC INFORMATION**

**Why did I get this notice?**

The Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial on damages. The trial is to decide whether Trans Union has willfully

violated the Fair Credit Reporting Act, the amount of statutory damages between \$100-\$1,000 per Class Member, plus punitive damages, if any, to be assessed. The lawsuit is known as *Norman v. Trans Union, LLC*, Civil Action No. 2:18-cv-05225-GAM (E.D. Pa.).

#### What is this lawsuit about?

Plaintiff Duane Norman, Sr. has alleged that after he submitted a dispute to Trans Union that his credit report was obtained without authorization or a proper purpose, Trans Union did not contact the company that requested the credit report, nor did it remove the notation (called a “hard inquiry”) that he disputed. Instead, Trans Union mailed to Mr. Norman and the other Class Members, including you, a “502 Letter” that stated:

“The inquiries listed on your credit report are a record of the companies that obtained your credit information. The identity of each company by trade name and contact information is provided. All inquiries remain on your credit report for two years. Credit information may be requested only for the following permissible purposes: credit transactions, employment consideration, review or collection of an existing account or other legitimate business need, insurance underwriting, government licensing, rental dwelling, or pursuant to a court order. Your written authorization may not be required to constitute permissible purpose. If you believe that an inquiry on your credit report was made without a permissible purpose, then you may wish to contact the creditor directly, by phone or in writing, regarding its purpose.”

Plaintiff’s legal claim is that Trans Union violated a federal law called the Fair Credit Reporting Act by failing to conduct a reasonable investigation of his dispute of an item of information in his credit file or, alternatively, by not removing the disputed item from his file. Plaintiff alleges that Defendant did the same thing with respect to the Class.

#### What is a class action and who is involved?

In a class action lawsuit, one or more people called the “Class Representative,” in this case Duane E. Norman, Sr., sue on behalf of other people who have similar claims. All of the people together are called a “Class” or “Class Members”. The consumer reporting agency he sued, Trans Union, is called the Defendant. One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class. The Court decided that this lawsuit can proceed as a class action and move towards a trial.

#### Why is this lawsuit a class action?

More information about why the Court is allowing this lawsuit to proceed as a class action is found in the Court’s Opinion and Order certifying the Class, which is available at [www.TransUnionDisputeClassAction.com](http://www.TransUnionDisputeClassAction.com).

### **THE CLAIMS IN THE LAWSUIT**

#### What does the lawsuit complain about?

In the lawsuit, Plaintiff claims that Trans Union violated the Fair Credit Reporting Act, as described above. You can read the Plaintiff’s full Complaint at [www.TransUnionDisputeClassAction.com](http://www.TransUnionDisputeClassAction.com).

#### How did Defendant answer?

Trans Union denied that it violated the Fair Credit Reporting Act and asserted that this case should not proceed as a class action. Trans Union’s Answer to the Complaint is also posted on the same website.

#### Has the Court decided who is right?

The Court has not yet decided whether Trans Union has violated the law, or how much money, if any, should be awarded to the Class. The court has simply decided that this case may proceed as a class action.

#### What is the Plaintiff asking for?

The Plaintiff will ask the Court to award statutory damages of between \$100 and \$1,000 to each member of the Class. Plaintiff will also ask the Court to order Trans Union to pay punitive damages and Class Counsel fees and expenses.

Questions? Visit [www.TransUnionDisputeClassAction.com](http://www.TransUnionDisputeClassAction.com)

Is there any money available now?

No money or benefits are available now because the Court has not yet decided who is right, or how much, if anything, Trans Union should pay the Class in damages. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified unless you exclude yourself from this case.

**YOUR RIGHTS AND OPTIONS**

You have to decide whether to stay in the Class (do nothing right now) or ask to be excluded before the trial. You have until June 18, 2021, to exclude yourself.

What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. **By doing nothing, you stay in the Class.** If you do nothing now, regardless of whether the Plaintiff wins or loses the trial, you will not be able to sue, or continue to sue, Trans Union, about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the orders and judgments the Court issues in this case.

Why would I ask to be excluded?

If you already have a lawsuit against Trans Union for similar claims and want to continue with it, you need to ask to be excluded from the Class. If you exclude yourself from the Class – sometimes called “opting-out” of the Class – you will not get any money or benefits from this lawsuit even if the Plaintiff wins damages at trial or there is a settlement. However, you may be able to sue or continue to sue Trans Union on your own. If you exclude yourself, you will not be legally bound by the Court's Order and Judgment in this class action.

If you start your own lawsuit against Defendant after you exclude yourself, you'll have to seek damages in court, and you may have to hire and pay for your own lawyer for that lawsuit. If you do exclude yourself so you can start your own lawsuit against Defendant, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations or other time-sensitive requirements.

How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must send an “Opt-Out Request” in the form of a letter sent by U.S. Mail, facsimile, or e-mail stating that you want to be excluded from *Norman v. Trans Union*. Instructions on submitting a request to opt-out are also on the class action website, **[www.TransUnionDisputeClassAction.com](http://www.TransUnionDisputeClassAction.com)**. Be sure to include your name, address, telephone number, email address if you have one, and to sign the opt-out letter. You must mail your Opt-Out Request postmarked or time-stamped by June 18, 2021 to *Norman v. Trans Union* Opt-Outs, PO Box 23698, Jacksonville, FL 32241-3698, or fax the letter to (877) 430-1941, or e-mail your request to [info@TransUnionDisputeClassAction.com](mailto:info@TransUnionDisputeClassAction.com).

**THE ATTORNEYS REPRESENTING YOU**

Do I have an attorney in this case?

The Court has certified the law firms of Francis Mailman Soumilas, P.C. and Flitter Milz, P.C. as Class Counsel. Their contact information is as follows:

Francis Mailman Soumilas, P.C.  
1600 Market Street, Suite 2510  
Philadelphia, PA 19103

Flitter Milz, P.C.  
450 N. Narberth Ave., Suite 101  
Narberth, PA 19072

Should I get my own attorney?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you may retain one at your expense. You can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you, at the Court's discretion.

How will the attorneys be paid?

If Class Counsel obtain money or benefits for the Class through this suit, they will ask the Court to award counsel fees and expenses. You won't have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would either be deducted from any money obtained for the Class or paid separately by Defendant. Class Counsel has not been paid any fees, nor reimbursed their expenses for prosecuting this case since it was filed in 2018.

**THE TRIAL**

When is the trial?

Trial has not yet been scheduled. Note that trial dates are sometimes rescheduled, especially during this Covid-19 pandemic. You may obtain more information about the trial date at the website: ***www.TransUnionDisputeClassAction.com***.

Do I have to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Plaintiff and the Class, and Defendant will present its defenses. You or your own lawyer are welcome to attend at your own expense.

Will I get money after the trial?

If at some point the Plaintiff obtains money or benefits for the Class as a result of the trial or a settlement, and you did not exclude yourself from the Class, you will be notified. There could be post-trial proceedings and appeals. We do not know how long this will take, and there is no guarantee.

Are more details available?

Visit the website, ***www.TransUnionDisputeClassAction.com*** where you will find the Court's Order and Opinion certifying the Class, Plaintiff's Class Action Complaint, the Defendant's Answer to the Complaint, as well as information about how to exclude yourself as a Class Member. You may also speak to one of the attorneys working on this class action by calling: 1-(800)-566-0596 or e-mailing at the following address: ***info@consumerlawfirm.com***.