

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

WILLIAM NORMAN BROOKS, III,

*Plaintiff,*

v.

TRANS UNION, LLC,

*Defendant.*

Civil Matter No. 2:22-cv-00048-KSM

**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”) asserting that Trans Union included inaccurate information regarding bankruptcy filings on consumer credit reports.
- A review of Trans Union’s records and publicly-held bankruptcy records indicate that you are a member of the following Class certified by the Court:

For the period beginning January 6, 2020 to January 31, 2023, all persons residing in the United States and its Territories to whom Trans Union sold a consumer report to a third party which included a bankruptcy remark on a tradeline, but with no reference to a bankruptcy record in the public record section of the same report, and for whom there is no government-held public record of a bankruptcy filing within ten (10) years prior to the date of the report.

- 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.*

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT</b>	
<b>DO NOTHING</b>	<p><b>Stay in this lawsuit. Await the outcome. Give up certain rights.</b></p> <p>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.</p>
<b>ASK TO BE EXCLUDED</b>	<p><b>Remove yourself from this class action. Get no benefits or money. Keep certain rights.</b></p> <p>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.</p>

- Your options are explained in this notice. To ask to be excluded, you must act before July 7, 2025.
- 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.BrooksBankruptcyClassAction.com** or call toll-free (833) 215-9289.

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

## **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 *Brooks v. Trans Union, LLC*, Civil Action No. 2:22-cv-00048-KSM (E.D. Pa.).

### **What is this lawsuit about?**

Plaintiff Brooks has alleged that Trans Union sold consumer credit reports about consumers that contained inaccurate bankruptcy information, by including on the credit report a reference to a bankruptcy filing as part of a particular credit account (called a “remark,”) even where the Trans Union credit report does not have a record of a bankruptcy court filing on the same credit report. Plaintiff asserts that where there is no publicly-available record of a bankruptcy filing within ten years before the date of the credit report, it is inaccurate to report bankruptcy information in this way.

Plaintiff’s legal claim is that Trans Union willfully violated a federal law called the Fair Credit Reporting Act by failing to follow reasonable procedures to assure the maximum possible accuracy of the information on these consumer credit reports. Trans Union denies that it violated the Fair Credit Reporting Act and asserts that this case should not proceed as a class action.

### **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 William Norman Brooks, III, 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.BrooksBankruptcyClassAction.com](http://www.BrooksBankruptcyClassAction.com)**.

### **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.BrooksBankruptcyClassAction.com](http://www.BrooksBankruptcyClassAction.com)**.

### **How did Defendant answer?**

Trans Union denies that it willfully violated the Fair Credit Reporting Act and asserts 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 willfully 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.

### **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 July 7, 2025, 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.

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

### 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 or e-mail stating that you want to be excluded from *Brooks v. Trans Union*. Instructions on submitting a request to opt-out are also on the class action website, **www.BrooksBankruptcyClassAction.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 July 7, 2025 to: *Brooks v. Trans Union* Opt-Outs, c/o Notice Administrator, P.O. Box 16, West Point, PA 19486; or e-mail your request to [questions@BrooksBankruptcyClassAction.com](mailto:questions@BrooksBankruptcyClassAction.com).

### Do I have an attorney in this case?

The Court has appointed the law firms of Francis Mailman Soumilas, P.C. and Hussin Law Firm as counsel for the Class (“Class Counsel”). Their contact information is as follows:

Francis Mailman Soumilas, P.C.  
1600 Market Street, Suite 2510  
Philadelphia, PA 19103  
Tel. (877) 735-8600

Hussin Law Firm  
1596 N. Coast Hwy 101  
Encinitas, CA 92024  
Tel. (877) 677-5397

### 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 2022.

## **THE TRIAL**

### When is the trial?

The lawsuit has been scheduled for trial on November 18, 2025 at 9:30 a.m. Information about any changes to that date and time will be posted on the website **www.BrooksBankruptcyClassAction.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.

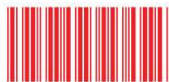
### Are more details available?

Visit the website **www.BrooksBankruptcyClassAction.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: (877) 735-8600 or e-mailing at the following address: **info@consumerlawfirm.com**.

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

Brooks v. Trans Union  
c/o Notice Administrator  
P.O. Box 16  
West Point, PA 19486

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE PAID  
MAG



NUMERIC EQUIVALENT

ID #: <<ID #>>

<<Name1>>

<<Address1>>

<<Address2>>

<<City>>, <<St>> <<Zip>>

<<Country>>