

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY, ILLINOIS

Tasker v. Watershed Foods, LLC, Case No. 2024CH000013

IF YOUR FAMILY MEDICAL HISTORY WAS REQUESTED AT A PHYSICAL EXAMINATION RELATED TO YOUR EMPLOYMENT WITH WATERSHED FOODS, LLC ON SEPTEMBER 5, 2018 OR AFTER, YOU ARE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- Plaintiff Philip Tasker filed a class action lawsuit alleging that Watershed Foods, LLC (“Watershed”) violated Illinois’ Genetic Information Privacy Act, 410 ILCS 513, et seq. (“GIPA”), based on Watershed allegedly requesting genetic information from employees in connection with medical examinations conducted prior to or during employment. Watershed firmly denies the allegations, which it believes are entirely without merit.
- A Settlement has been reached in this case and affects the following persons: All individuals from September 5, 2018 to the present (1) who applied for employment with Watershed or were employed by Watershed and (2) from whom Watershed directly or indirectly requested genetic information, such as family medical history, in connection with the person’s application for employment or the person’s employment with Watershed.
- The Settlement, if approved, would provide for the establishment of a Settlement Fund in the amount of \$122,500 USD to pay for: (i) all Settlement Payments; (ii) all Settlement Administration Expenses; (iii) any Incentive Awards to the Class Representative; and (iv) any Fee Award to Class Counsel.
- Your legal rights are affected whether you act or don’t act. Read this notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

EXCLUDE YOURSELF	You may request to be excluded from the Settlement and, if you do, you will receive no benefits from the Settlement. Deadline: July 6, 2026
OBJECT	Write to the Court if you do not like the Settlement. Deadline: July 6, 2026
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	If you do nothing and the Court approves the Settlement and it becomes final and effective, you will receive a payment and will be bound by the terms of the Settlement. You will give up your right to bring a separate lawsuit about the claims in this case.

- These rights and options - and the deadlines to exercise them - are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. If it does, and after any appeals are resolved, payments will be distributed to those who receive this notice and do not exclude themselves. Please be patient.

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BASIC INFORMATION

1. Why is there a Notice?

A court authorized this Notice because you have a right to know about a proposed Settlement of the class action lawsuit known as *Tasker v. Watershed Foods, LLC*, Case No. 2024CH000013, and about all of your options before the Court decides whether to give Final Approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Circuit Court of McLean County, Illinois is overseeing this case. The person who sued, Philip Tasker, is called the “Plaintiff” or “Class Representative.” Watershed Foods, LLC is the “Defendant.”

2. What is this litigation about?

The lawsuit alleges that Watershed violated the Illinois Genetic Information Privacy Act, 410 ILCS 513, *et seq.* (“GIPA”), based on Watershed allegedly directly or indirectly requesting genetic information, such as family medical history, in connection with the person’s application for employment or the person’s employment with Watershed.

Watershed denies all wrongdoing or liability of any kind whatsoever asserted by Plaintiff or Settlement Class Members in the Litigation. Watershed firmly denies the allegations, which it believes are entirely without merit. Watershed maintains full confidence in the integrity of its conduct, and remains committed to transparency, ethical operations, and its longstanding reputation for professionalism. Despite Watershed’s belief that it is not liable for the allegations in the Litigation and despite Watershed’s belief that it has viable defenses to those allegations, Watershed desires to settle the Litigation, and thus avoid the expense and burden of continued litigation of any action or proceeding relating to the matters being fully settled and finally put to rest in this Settlement Agreement.

The Plaintiff’s Complaint, Class Action Settlement Agreement and Release, and other case-related documents are posted on the Settlement Website, www.WatershedGIPASettlement.com. The Settlement resolves the lawsuit. The Court has not decided who is right.

3. Why is this a class action?

In a class action, the persons called the “Class Representative” (in this case, Plaintiff) sue on behalf of themselves and other people with similar claims.

All the people who have claims similar to the Plaintiff are Settlement Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a class settlement?

The Court has not found in favor of either the Plaintiff or the Defendant. Instead, both sides have agreed to a settlement. By agreeing to the Settlement, the parties avoid the costs and uncertainty of a trial, and if the Settlement is approved by the Court, Settlement Class Members will receive a Settlement Payment, as described in this Notice. Watershed denies all legal claims in this case. Plaintiff and his lawyers think the proposed Settlement is best for everyone who is affected.

WHO IS PART OF THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class includes the following persons:

All individuals in Illinois (1) who from September 5, 2018 through the present, applied for employment with Defendant or were employed by Defendant and (2) from whom Defendant directly or indirectly requested genetic information, such as family medical history, in connection with the person's application for employment or the person's employment with Defendant.

Excluded from the Settlement Class are:

(i) any judge or magistrate judge presiding over this Action, members of their staff, and members of their immediate families; (ii) Settlement Class Members who properly execute and file a timely request for exclusion from the Settlement Class; and (iii) the legal representatives, successors, and assigns of any such excluded persons.

If you are receiving this notice, you are a Settlement Class Member.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class or have any other questions about the Settlement, visit the Settlement Website at www.WatershedGIPASettlement.com or call the toll-free number, 833-417-4973. You also may send questions to the Settlement Administrator at info@WatershedGIPASettlement.com.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

The Settlement provides for the establishment of a Settlement Fund in the amount of \$122,500.00 USD (the "Settlement Fund"), to pay: (1) Settlement Administration Expenses, (2) Settlement Payments, (3) the Incentive Award, and (4) the Fee Award.

Each Settlement Class Member who does not exclude themselves will receive a settlement payment of a pro rata share of the Settlement Fund.

8. How do I file a Claim?

You do not need to file a Claim. You have already been identified as a member of the Class and will receive a Settlement Payment of a *pro rata* share of the Settlement Fund regardless of whether you submit a Claim.

9. When will I receive my payment?

Payments to Settlement Class Members will be made only after the Court grants Final Approval to the Settlement and after any appeals are resolved (see "Final Approval Hearing" below). If there are appeals, resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want benefits from the Settlement, or you want to retain the right to sue or continue to sue Watershed on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is sometimes referred to as "opting out" of the Settlement Class.

10. How do I get out of the Settlement?

In order to exercise the right to be excluded, a Member of the Settlement Class must timely send an individual, written letter requesting exclusion from Settlement to the Settlement Administrator providing: (i) the Settlement Class Member's name, address, and email; (ii) the Settlement Class Member's signature; (iii) the name and number of the Action; and (iv) a statement that the Settlement Class Member wishes to be excluded from the Settlement Class for purposes of the Settlement.

To be valid, a request for exclusion must be postmarked or received by the Objection/Exclusion Deadline. A request to be excluded that does not include all of the foregoing information, or that is sent to an address other than the below, or that is not postmarked or received by the Objection/Exclusion Deadline, or which otherwise does not comply with the requirements set forth in the parties' Settlement Agreement, shall be invalid, and the person(s) submitting such a request shall remain a member(s) of the Settlement Class and shall be bound as a Settlement Class Member by the Settlement Agreement, if approved.

Watershed GIPA Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799

You may opt out of the Settlement Class only for yourself.

11. If I do not exclude myself, can I sue Watershed for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Watershed for the claims that the Settlement resolves. You must exclude yourself from this Settlement Class in order to pursue your own lawsuit.

12. What am I giving up to stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue or be part of any other lawsuit against Watershed about the issues in this case, including any existing litigation, arbitration, or proceeding. Unless you exclude yourself, all of the decisions and judgments by the Court will bind you.

The Class Action Settlement Agreement & Release is available at www.WatershedGIPAsettlement.com. The Class Action Settlement Agreement & Release provides more detail regarding the Released Claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can talk to the law firm representing the Settlement Class listed in Question 14 for free, or you can, at your own expense, talk to your own lawyer if you have any questions about the Released Claims or what they mean.

13. If I exclude myself, can I still get a payment?

No. You will not get a payment from the Settlement Fund if you exclude yourself from the Settlement.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in the case?

The Court has appointed the following lawyers as "Class Counsel" to represent all Members of the Settlement Class.

Burke Law Offices, LLC
909 Davis Street, Suite 500
Evanston, IL 60201

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

15. How will the lawyers be paid?

Class Counsel intends to request up to 40% of the Settlement Fund as payment for attorneys' fees, as well as reimbursement out-of-pocket expenses costs in the amounts of \$49,000.00 USD. The Court will decide the amount of fees and expenses to award.

Class Counsel will also request that an Incentive Award of \$10,000 USD be paid to the Class Representative for his services as representatives on behalf of the Settlement Class.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member (and do not exclude yourself from the Settlement Class), you can object to any part of the Settlement.

Any objection to the Settlement Agreement, and any papers submitted in support of said objection, shall be considered by the Court at the Final Approval Hearing only if, on or before the Objection/Exclusion Deadline, the person making an objection shall file notice of that person's intention to do so and at the same time: (i) file copies of such papers the person proposes to submit at the Final Approval Hearing with the Clerk of the Court, or alternatively, if the objection is from a Settlement Class Member represented by counsel, files any objection through the Court's electronic filing system; and (ii) send copies of such papers via United States mail, hand delivery, or overnight delivery to Class Counsel and Watershed's Counsel. A copy of the objection must also be mailed to the Settlement Administrator at the address designated by the Settlement Administrator to receive requests for exclusion or objections.

Court	Settlement Administrator
Eleventh Judicial Circuit Court of McLean County, Illinois Office of the Circuit Court Clerk 104 W. Front St. Room 303 / 404 Bloomington, IL 61701	Watershed GIPA Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA, 92799
Class Counsel	Watershed's Counsel
Burke Law Offices, LLC 909 Davis Street, Suite 500 Evanston, IL 60201	UB Greensfelder LLP Attn: Abby Risner 10 S. Broadway, Suite 2000 St. Louis, MO 63102

Any Settlement Class Member who intends to object to this Settlement must include in any such objection: (i) the Settlement Class Member's full name, address, email address, and current telephone number; (ii) the case name and number of the Action; (iii) all other information required in identifying the objector as a Settlement Class Member, including proof that the objector is a Settlement Class Member; (iv) all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials; (v) the identification of any other objections the Settlement Class Member has filed, or has had filed on the Settlement Class Member's behalf, in any other class action cases in the last four years; and (vi) the objector's signature.

If represented by counsel, the objecting Settlement Class Member must also provide the name and telephone number of the Settlement Class Member's counsel. If the objecting Settlement Class Member intends to appear at the Final Approval Hearing at the Settlement Class Member's own expense, either with or without counsel, the Settlement Class Member must state as such in the written objection, and must also identify any witnesses the Settlement Class Member may call to testify at the Final Approval Hearing and all exhibits the Settlement Class Member intends to introduce into evidence at the Final Approval Hearing, which must also be attached to, or included with, the written objection.

17. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses ("Final Approval Hearing").

18. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Final Approval Hearing on **August 3, 2026 at 9:30 am** at Courtroom 5D of the Circuit Court of McLean County, Illinois via Zoom (Meeting ID 947 194 3584). The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.WatershedGIPASettlement.com for updates. At the Final Approval Hearing, the Parties will request that the Court consider whether the Settlement Class should be certified as a class pursuant to 735 ILCS 5/2 for settlement and, if so, (i) consider any properly-filed objections; (ii) determine whether the Settlement is fair, reasonable and adequate, was entered into in good faith and without collusion, and should be approved, and shall provide findings in connections therewith; and (iii) enter the Final Approval Order, including final approval of the Settlement Agreement, and a Fee Award. It is unknown how long these decisions will take.

19. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time and it complies with all the other requirements set forth above, the Court will consider it. You may also pay your own lawyer to attend the hearing, but it is not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing (see Question 16 above). You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you do nothing, you will give up your right to bring your own lawsuit against Watershed about the Claims in this case. You will still receive a payment if you do nothing. Unless you exclude yourself, you will be bound by the judgment entered by the Court.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Class Action Settlement Agreement & Release, which you can view at www.WatershedGIPASettlement.com. You can also contact the Settlement Administrator by mail, email or phone.

Watershed GIPA Settlement
c/o Settlement Administrator
P.O. Box 25226, Santa Ana, CA 92799
info@WatershedGIPASettlement.com
833-417-4973