

**NOTICE OF CLASS ACTION SETTLEMENT**

*Sandra J. Bates v. Knight's Airport Limousine Service, Inc. et al.*  
Worcester Superior Court Civ. No. 1785CV-0609-C

**If you were a passenger in a Knight's Airport Limousine Service, Inc. ("Knight's") vehicle between April 14, 2014 and December 31, 2016 (the "Class Period"), you may be entitled to benefits under a class action settlement.**

In a lawsuit filed with the Worcester Superior Court, a former Knight's employee alleges that Knight's and several of its principals (collectively, "Defendants") secretly heard, intercepted, recorded, or disclosed audio and/or oral communications of drivers of and passengers in Knight's Vehicles, in violation of the Massachusetts Wiretap Act, M.G.L. c. 272, § 99, and Massachusetts Privacy Law, M.G.L. c. 214, § 1B. Defendants deny these allegations and assert that all drivers and passengers had actual knowledge of recording devices in Knight's Vehicles.

The Court has granted preliminary approval of the settlement and has scheduled a hearing on January 8, 2019 at 2:00 p.m. in Courtroom #26 of the Worcester Superior Court, 225 Main St., Worcester, MA 01608, to determine whether to grant final approval of the settlement.

This Notice is directed at persons who rode as a passenger in a Knight's Vehicle in Massachusetts during the Class Period (the "Passenger Class"). Subject to Court approval, Knight's shall offer to each Passenger Class Member a twenty-percent (20%) discount off one (1) regular round trip fare (the "Passenger Class Member Discount"). The combined value of discounts provided to Passenger Class Members shall not exceed \$200,000.00 ("Passenger Fund Cap").

If you do nothing, you will be bound by the Settlement and will, upon Court approval, receive the benefits described above. You will be deemed to have released all your federal, state, common law, and local claims for unlawful interception, use, or disclosure of audio recordings, breach of privacy, or any related claims against Defendants during the Class Period. Alternatively, you have the right to file an objection with the Court. For more information regarding the Settlement including proposed fees of the Class Counsel and Class Representative, links to Court documents, and instructions for filing an objection, you can go to: <http://forrestlamothe.com/class-notice/>.