

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**If Admin Recovery LLC sent you a collection letter that attempts to collect on a Western Sky loan, you may benefit from this class action settlement.**

*The case is titled Maxwell Hester v. Admin Recovery LLC, Case No. 15-cv-0984 ("Litigation"). A Federal Court authorized this notice. This is not a solicitation from a lawyer.*

**THIS IS A NOTICE OF A SETTLEMENT OF A CLASS ACTION LAWSUIT.  
THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.**

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

<b>DO NOTHING AND RECEIVE A PORTION OF SETTLEMENT PROCEEDS</b>	If you do nothing, you will receive the settlement's benefits. Please be sure to let Class Counsel and/or the Settlement Administrator know if you have moved.
<b>EXCLUDE YOURSELF</b>	You will receive no benefits, but you will retain your legal claims against the Defendant.
<b>OBJECT</b>	Write to the Court explaining why you don't like the settlement. You may also appear at the fairness hearing.
<b>GO TO A HEARING</b>	Ask to speak in Court about the fairness of the settlement.

**1. Why did I get this notice?**

You are receiving this notice because you were identified as a person to whom Admin Recovery LLC sent a collection letter similar to the collection letter received by the plaintiff in this case.

**2. What is the lawsuit about?**

This lawsuit claims that Admin Recovery LLC violated the Fair Debt Collection Practices Act, ("FDCPA"), 15 U.S.C. §1692 *et seq.* by sending letters which attempted to collect loans that were illegal under Illinois law.

**3. Why is this a class action?**

In a class action, one or more people called Class Representatives (in this case, Maxwell Hester), sue on behalf of a group (or a "Class") of people who have similar claims regarding the collection letters allegedly used by Defendant in an attempt to collect a debt.

**4. Why is there a settlement?**

To avoid the cost, risk, and delay of litigation, the parties reached a settlement agreement as to Plaintiff's and the Class's claims in the Litigation.

**5. How do I know if I am a part of the settlement?**

According to Defendant's records, you are a class member.

## YOUR BENEFITS UNDER THE SETTLEMENT

### 6. What can I get from the settlement?

You will receive a pro rata share of the statutory damages recovery of \$4,000. There are approximately 87 persons in the Settlement Class. If each person remains in the Settlement Class, you will receive approximately \$45.00.

If you paid money to Admin Recovery LLC in response to the collection letter you received, you will also receive approximately 80% of amount you paid in return. There is a total of \$5,000 to reimburse those Settlement Class Members who paid Admin Recovery LLC. Class Members will receive only one check.

Any amount remaining in the Settlement Fund as a result of uncashed settlement checks or undistributed settlement funds shall be donated to Legal Council for Health Justice as a cy pres award, subject to court approval.

### 7. When will I receive these benefits?

You will receive these benefits approximately 60-75 days after the Court enters a Final Approval Order. This estimation is premised on the assumption that no objections are received.

### 8. I want to be a part of the settlement and receive these benefits. What do I do?

You do not need to do anything to receive benefits from the settlement. If you have moved from the address where this notice was sent, please contact counsel for the class (listed below) or the settlement administrator, Class-Settlement.com, PO Box 9009, Hicksville, NY 11802-9009, or (877) 268-2976, to ensure that your check is delivered to the right address.

### 9. What am I giving up to receive these benefits?

By staying in the class, all of the Court's orders will apply to you, and you give Defendant a "release". A release means you cannot sue or be part of any other lawsuit against Defendant about the claims or issues in the case.

### 10. How much will the Class Representative receive?

Plaintiff Maxwell Hester will receive a payment as a Settlement Class Member and an incentive award for acting as class representative in the amount of \$1,000. This \$1,000 payment will be made in addition to the Class Recovery (set forth in paragraph 6) and will not reduce the amount that you or any other class member is entitled to receive from the settlement. The total payment to Plaintiff Hester is subject to the Court's Approval.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to receive the benefits of the settlement but you want to keep your legal claims against the Defendant, then you must take steps to exclude yourself from this settlement

### 11. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail stating that you want to be excluded from *Maxwell Hester v. Admin Recovery LLC, Case No. 15-cv-00984* (N.D. Ill.). Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request so that it is postmarked **no later than February 18, 2016**, to:

EDELMAN, COMBS, LATTURNER AND GOODWIN, LLC (30966)  
20 S. Clark St. Suite 1500  
Chicago, IL 60603

### 12. If I exclude myself, do I still receive benefits from this settlement?

No, you will not receive anything resulting from the settlement, but you will have the right to sue Admin Recovery LLC over the claims raised in the Litigation, either on your own or as a part of a different lawsuit. If you exclude yourself, the time you have in which to file your own lawsuit (called the "statute of limitations") will begin to run again. You will have the same amount of time to file the suit that you had when this case was filed.

## THE LAWYERS REPRESENTING YOU

### 13. Do I have a lawyer in this case?

The Court has named the law firm of Edelman, Combs, Lattuner & Goodwin, LLC as Class Counsel. You will not be charged for these lawyers; however, they will receive a payment from the Defendant in an amount to be determined by and approved by the Court and as set forth below in Paragraph 14. If you want to be represented by your own lawyer, you may hire one at your own expense. If you choose to hire your own lawyer, he or she must file an appearance by **February 18, 2016**.

### 14. How will the lawyers be paid?

Class Counsel, Edelman, Combs, Lattuner & Goodwin, LLC will Petition the Court for their reasonable attorney's fees and costs in the amount of \$10,000. This amount is subject to Court approval. This payment will be made in addition to the Class Recovery and will not reduce the amount that you or any other class member is entitled to receive from the settlement.

## CLASS COUNSEL'S VIEWS ABOUT THE SETTLEMENT

### 15. Is this a fair settlement?

Class Counsel believes that this settlement is fair. The claims asserted on behalf of the class against Admin Recovery LLC are under the FDCPA. The FDCPA is a federal statute which provides for both individual actions and class actions. In an individual action, the person bringing the suit may recover (i) any actual damages suffered; and (ii) statutory damages of between \$0 and \$1,000.00. (Plaintiff's complaint sought actual damages.) In a class action, the maximum possible recovery is (i) any actual damages suffered by the class members and (ii) the lesser of 1% of the Defendant's net worth or \$500,000.00. Because of Defendant's net worth, the maximum class recovery is \$8,700. In addition, the actual damages are \$6,056.43. Here, defendant is paying less than 1% of its net worth in statutory damages, \$4,000, and Defendant is paying approximately 80% or \$5,000 to reimburse those class members who paid money in response to Admin Recovery LLC's collection letters. The Court, in its discretion, may award anything up to the maximum amount to a prevailing party. In either an individual or class action, the person bringing the suit can also recover attorneys' fees and the expenses of prosecuting the suit, if it is successful.

In this case, Defendant has agreed to establish a settlement fund of less than 1% of their net worth, plus reimburse approximately 80% of the money they collected. Defendant has agreed to distribute this \$4,000 statutory damages settlement fund *pro rata* to each of the approximately 87 class members, while those who paid in response to the collection letters they received will be reimbursed from a fund of \$5,000 an amount of approximately 80% of what they paid. The total payout approximates the maximum statutory damages and actual damages recovery for the class provided for under the FDCPA. Class Counsel believes this is a fair and reasonable settlement.

### 16. What is the Defendant's view of this settlement?

As stated above, by settling this lawsuit, Admin Recovery LLC is not admitting that they did anything wrong. Admin Recovery LLC expressly denies the claims asserted by the Plaintiff and denies all allegations of wrongdoing and liability.

## OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

### 17. How do I tell the Court that I do not like the Settlement?

If you are a class member, you can object to the settlement. In order to object to the settlement or any part of the settlement, you must send a letter stating that you object and the reasons why you think the Court should not approve the settlement. You must include the name and number of the case: *Maxwell Hester v. Admin Recovery LLC, Case No. 15-cv-00984* (N.D. Ill.), your name, address, telephone number, and your

signature. You must explain the legal and factual basis for the objection and provide documentation, if any, to support your objection. If you are objecting to the settlement, you may also appear at the fairness hearing (explained below in answer to question no. 18). You must mail your objection so that it is postmarked no later than **February 18, 2016** to:

Clerk of the Court, United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604

You must also send a copy of your objection to **these attorneys**:

EDELMAN, COMBS, LATTURNER  
AND GOODWIN, LLC (30966)  
20 S. Clark St. Suite 1500  
Chicago, IL 60603

John P. Touhey  
Admin Recovery LLC  
45 Earhart Drive, Suite 102  
Williamsville, NY 14221

### THE FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend if you wish, but you are not required to do so.

#### 19. Where and when is the fairness hearing?

The Court will hold a fairness hearing on **March 29, 2016 at 10:00 a.m.** in the courtroom of Judge Andrea R. Wood, Room 1925 of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604. The purpose of the hearing will be for the Court to determine whether the proposed settlement is fair, reasonable, and adequate, and in the best interests of the class, and to determine the appropriate amount of compensation for Class Counsel. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THIS HEARING TO BENEFIT FROM THIS SETTLEMENT. The hearing may be postponed to a later date without notice

#### GETTING MORE INFORMATION – CONTACT:

Edelman, Combs, Lattuner & Goodwin, LLC (30966)  
20 S. Clark St., Suite 1500  
Chicago, IL 60603  
(312) 739-4200  
[info@edcombs.com](mailto:info@edcombs.com)  
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