

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

LYNN SCOTT, LLC, et al., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

GRUBHUB INC.,

Defendant.

Case No. 1:20-CV-06334

Honorable LaShonda A. Hunt

**DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION
AND ADEQUACY OF NOTICE PLAN**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.
3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans.
4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq and Epiq Legal Noticing (hereinafter “Epiq”).

OVERVIEW

5. This declaration describes the successful implementation of the Settlement Notice Plan (“Notice Plan”) and Notices (the “Notice” or “Notices”) for *Lynn Scott, LLC, et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334, pending in the United States District Court for the Northern District of Illinois, Eastern Division. I previously executed my *Declaration of Cameron R. Azari, Esq. Regarding Notice Plan* (“Notice Plan Declaration”) on August 26, 2025, which described the Notice Plan, detailed Epiq’s class action experience, and attached Epiq’s *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice programs. The Notice Plan as designed and implemented was the best notice practicable of providing notice to the Settlement Class.

NOTICE PLAN METHODOLOGY

6. Federal Rules of Civil Procedure, Rule 23 directs that notice must be “the best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort” and that “the notice may be by one or more of the following: United States mail, electronic means, or other appropriate means.”¹ The Notice Plan satisfied these requirements.

7. The Notice Plan as designed and implemented reached the greatest practicable number of Settlement Class Members. With the address updating protocols that were used, the Notice Plan’s individual notice efforts via email and/or mail to identified members of the Settlement Class reached approximately 99% of the identified Settlement Class. The reach was further enhanced by digital and social media notice, sponsored search listings, and a Settlement Website. In my experience, the Notice Plan was consistent with other court-approved notice programs, was the best notice practicable under the circumstances of this case and satisfied the requirements of due process, including its “desire to actually inform” requirement.²

¹ Fed. R. Civ. P. 23(c)(2)(B).

² *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”).

CAFA NOTICE

8. On September 5, 2025, Epiq sent 52 CAFA Notice Packages (“CAFA Notice”), as required by the Federal Class Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715. The CAFA Notice was sent via United States Postal Service (“USPS”) Priority Mail to 48 officials (the Attorneys General of 47 states and the District of Columbia). Per the direction of the Office of the Nevada, New York, and Connecticut Attorneys General, the CAFA Notice was sent to the Nevada, New York, and Connecticut Attorneys General electronically via email. The CAFA Notice was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States. Details regarding the CAFA Notice mailing are provided in the *Declaration of Kyle S. Bingham on Implementation of CAFA Notice*, dated September 5, 2025, which is included as **Attachment 1**.

NOTICE PLAN DETAIL

9. On September 4, 2025, the Court approved the Notice Plan and appointed Epiq as the Settlement Administrator in the *Order Granting Preliminary Approval of Class Action Settlement* (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court certified, for settlement purposes only, the following “Settlement Class”:

[A]ll businesses whose names or logos were used on Grubhub or any other part of the Grubhub Platform, including AllMenus, Eat24, Seamless, Tapingo, LevelUp, OrderUp, BiteGrabber, and MenuPages, from January 1, 2019 through April 30, 2024 without a contract with Grubhub.

Excluded from the Settlement Class are: corporate officers, members of the board of directors, and senior management of Defendant; any and all judges, justices, and chambers’ staff assigned to hear or adjudicate any aspect of this litigation; any members of the Settlement Class that validly opt out prior to the opt-out deadline; any entity in which Defendant has a controlling interest, and their legal representatives, officers, directors, employees, assigns and successors; and Class Counsel and all counsel of record in the Action.

10. After the Court’s Preliminary Approval Order was entered, Epiq implemented the Notice Plan. This declaration details the notice activities undertaken to date and explains how and why the Notice Plan was comprehensive and well-suited to reach the Settlement Class. This declaration also discusses the administration activity to date.

NOTICE PLAN

Individual Notice

11. On August 19, 2025, Epiq received two data files containing 501,984 identified Settlement Class Member records, which included business names, physical addresses, phone numbers, and email addresses as available (“Class List”). Epiq deduplicated and rolled-up the records and loaded the unique, identified Settlement Class Member records into its database for this Settlement. These efforts resulted in 392,244 unique, identified Settlement Class Member records. Of these records, 275 records did not contain a complete associated mailing address or valid email address and were run through the National Change of Address (“NCOA”) process described in paragraph 17. No addresses were discovered through this process to provide Notice. Overall, notice was sent to 391,969 identified Settlement Class Member records with an available mail and/or email address. For the 391,969 identified Settlement Class Member records, combined, 402,300 Email Notices and Postcard Notices were sent.

Individual Notice – Email Notice

12. On November 3, 2025, Epiq commenced sending 78,076 Email Notices to identified members of the Settlement Class for whom a valid email address was available. Some identified members of the Settlement Class shared the same valid email address and only one Email Notice was sent per unique, valid email address.

13. Prior to sending the Email Notices, email validation and hygiene tools are used to standardize the email addresses, verify whether the email addresses are valid, and identify and remove email addresses that are a fraud threat – email addresses maintained by bots, spammers, and phishers. This is a necessary and critical process for the effectiveness of email campaigns today. Without being proactive and using these tools, Email Notices inadvertently sent to bad actor email addresses could jeopardize and damage the reputation of the entire email campaign; likely causing the campaign itself to be flagged and blocked as a source of spam, preventing or delaying Email Notices from being sent to valid email addresses of Settlement Class Members.

14. In addition, the following industry standard best practices were followed. The Email Notice was drafted in such a way that the subject line, the sender, and the body of the message overcame SPAM filters and ensured readership to the fullest extent reasonably practicable. For instance, the Email Notice was created using an embedded html text format. This format provided easy-to-read text without graphics, tables, images, and other elements that in our experience increases the likelihood that the message is blocked by Internet Service Providers (ISPs) and/or SPAM filters for this type of email communication. The Email Notices were sent from an IP address known to major email providers as one not used to send bulk “SPAM” or “junk” email blasts. Each Email Notice was transmitted with a digital signature to the header and content of the Email Notice, which allowed ISPs to programmatically authenticate that the Email Notices were from our authorized mail services. Each Email Notice was also transmitted with a unique message identifier. The Email Notice included an embedded link to the Settlement Website and Claim Form. By clicking the links, recipients were able to easily complete the Claim Form and access the Long Form Notice and other information about the Settlement. The Email Notice clearly and concisely summarized the Settlement and the legal rights of the Settlement Class. The Email Notice is included as **Attachment 2**.

15. If the receiving email server could not deliver the message, a “bounce code” was returned to Epiq along with the unique message identifier. For any Email Notice for which a bounce code was received indicating that the message was undeliverable for reasons such as an inactive or disabled account, the recipient’s mailbox was full, technical autoreplies, etc., at least two additional attempts were made to deliver the Notice by email. As of March 13, 2026, 8,690 Email Notices were undeliverable (approximately 11.13 % of the Email Notice sent).

Individual Notice – Direct Mail

16. On November 3, 2025, Epiq began sending Postcard Notices to identified members of the Settlement Class with an associated physical address for whom a valid email address was not available. Subsequently, on November 24, 2025, Epiq commenced sending Postcard Notices to all identified members of the Settlement Class with an associated physical address for whom the email

address was not valid, or an Email Notice was returned as undeliverable after multiple attempts. Combined, 316,281 Postcard Notices were mailed via USPS first class mail. The Postcard Notice clearly and concisely summarized the Settlement and the legal rights of the Settlement Class Members. The Postcard Notice also had a QR Code for members of the Settlement Class to directly access the Claim Form. The Postcard Notice also directed the Settlement Class to the Settlement Website where they could access the Long Form Notice and additional information about the Settlement. The Postcard Notice is included as **Attachment 3**.

17. Prior to mailing the Postcard Notices, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the USPS.³ In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

18. The return address on the Postcard Notices is a post office box that Epiq maintains for this Settlement. The USPS automatically forwards Postcard Notices with an available forwarding address order that had not expired (“Postal Forwards”). As of March 13, 2026, 7,124 Postcard Notices were undeliverable (approximately 2.2 % of the Postcard Notices sent). Postcard Notices returned as undeliverable were re-mailed to any new address available through USPS information, for example, to the address provided by the USPS on returned pieces for which the automatic forwarding order had expired, or to better addresses that may be found using a third-party lookup service. This process is also commonly referred to as “skip-tracing.” Upon successfully locating better addresses, Postcard Notices were promptly re-mailed. As March 13, 2026, Epiq has remailed 3,560 Postcard Notices.

19. Additionally, a Long Form Notice was mailed to all persons who requested one via the toll-free telephone number or other means. As of March 13, 2026, Epiq mailed 105 Long Form

³ The NCOA database contains records of all permanent change of address submissions received by the USPS for the last four years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the person’s name and known address.

Notices as a result of such requests. The Long Form Notice is included as **Attachment 4**.

Notice Results

20. The Notices provided comprehensive information about the nature of the action, including the class definition, the terms of the Settlement, instructions on how to file a Claim Form, how to opt out from or object to the Settlement, and the date and time of the Final Approval Hearing.

21. As of March 13, 2026, an Email Notice and/or Postcard Notice was delivered to 388,724 of the 392,244 unique, identified Settlement Class Members. This means the individual notice efforts reached approximately 99% of the identified Settlement Class.

Media Plan

Internet Digital Notice Campaign

22. Internet advertising has become a standard component in legal notice programs. The internet has proven to be an efficient and cost-effective method to target class members as part of providing notice of class certification and/or a settlement for a class action case. According to MRI-Simmons⁴ data, 97% of all adults are online and 84% of all adults use social media.⁵

23. The Notice Plan included targeted digital advertising on the selected advertising network *Google Display Network*, which represents thousands of digital properties across all major content categories. Digital Notices were targeted to selected target audiences and were designed to encourage participation by members of the class—by linking directly to the Settlement Website, allowing visitors easy access to relevant information and documents.

24. Digital Notices were also placed on *X (Twitter)* one of the leading social media platforms in the United States. The social media campaign used an interest-based approach which

⁴ MRI-Simmons is a leading source of publication readership and product usage data for the communications industry. MRI-Simmons is a joint venture of GfK Mediamark Research & Intelligence, LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers comprehensive demographic, lifestyle, product usage and exposure to all forms of advertising media collected from a single sample. As the leading U.S. supplier of multimedia audience research, the company provides information to magazines, televisions, radio, internet, and other media, leading national advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United States. MRI-Simmons’s national syndicated data is widely used by companies as the basis for the majority of the media and marketing plans that are written for advertised brands in the United States.

⁵ MRI-Simmons 2024 Survey of the American Consumer®.

focused on the interests that users exhibited while on the social media platforms, capitalizing on the target audience's propensity to engage in social media. *X (Twitter)* is a popular microblogging social media website that allows posts/tweets containing images or videos. Users can like, comment, and share/retweet posts. *X* has more than 105 million users in the United States.⁶

25. The Digital Notices were distributed to a variety of target audiences, including those relevant to individuals' demonstrated interests and/or likes. All Digital Notices appeared on desktop, mobile, and tablet devices. Digital Notices on *Google Display Network* and *X* were displayed nationwide. Digital Notices were also targeted (remarketed) to people who clicked on a Digital Notice. More details regarding the Digital Notices are included in the following table:

<i>Network/Property</i>	<i>Target</i>	<i>Ad Size</i>	<i>Delivered Impressions</i>
<i>Google Display Network</i>	Custom Intent: Grubhub unauthorized listing	728x90, 300x250,	2,719,515
<i>Google Display Network</i>	Keyword Targeting: Restaurant Name	300x600 & 970x250	6,400,254
<i>X (Twitter)</i>	Post Engagement Targeting: Grubhub unauthorized listing	Feed	1,482,480
TOTAL			10,602,249

26. Combined, approximately 10.6 million targeted impressions were generated by the Digital Notices, which were targeted nationwide. The Digital Notices ran from November 3, 2025, through December 2, 2025.⁷ Clicking on the Digital Notices linked the readers to the case website, where they could easily obtain detailed information. Examples of the Digital Notices are included as **Attachment 5**.

Sponsored Search Listings

27. Sponsored search listings were acquired on the three most highly-visited internet search engines: *Google*, *Yahoo!*, and *Bing*, nationwide. When visitors to these search engines searched for

⁶ Statista Digital 2024: Global Overview Report.

⁷ The third-party ad management platform, ClickCease was used to audit the Digital Notice ad placements. This type of platform tracks all Digital Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent, or otherwise invalid traffic (e.g., ads being seen by 'bots' or non-humans, ads not being viewable, etc.).

keyword combinations related to the case, the sponsored search listing advertisement created for this case was displayed. Generally, the sponsored search listing advertisement appeared at the top of the visitor's website page prior to the search results or in the upper right-hand column of the web-browser screen. All sponsored search listings linked directly to the Settlement Website. The sponsored search listings resulted in 11,432 impressions with 520 clicks to the Settlement Website.

28. The sponsored search listings began on November 3, 2025, and ran through December 2, 2025. A complete list of the sponsored search keyword combinations is included as **Attachment 6**. Examples of the sponsored search listings as displayed on each search engine is included as **Attachment 7**.

Reminder Notice

29. A reminder notice campaign was implemented pursuant to paragraph VII(3) of the Settlement Agreement. The reminders were sent to (1) Settlement Class Members with a valid email address for whom the initial Email Notice was not returned as undeliverable and who had not filed a Claim Form or requested exclusion from the Settlement, (2) and to Settlement Class Members for whom valid email addresses could be located through a third-party and who were sent an initial Postcard Notice and who had not filed a Claim Form or requested exclusion from the Settlement. The reminder notice ("Claim Reminder Notice") is included as **Attachment 8**.

Settlement Website

30. On October 31, 2025, Epiq established a dedicated website for the Settlement with an easy to remember domain name (www.RestaurantListingSettlement.com). Relevant documents are posted on the Settlement Website, including the Settlement Agreement, Claim Form, Long Form Notice, and other case-related documents. After Counsel for Plaintiffs filed the Motion for Award of (1) Attorneys' Fees, (2) Reimbursement of Costs, and (3) Class Representative Service Awards on December 19, 2025, Epiq added the filing to the Settlement Website within two business days as required by the Preliminary Approval Order. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions ("FAQs"), instructions for how Settlement Class Members could opt-out (request exclusion) from or object to the Settlement prior to the deadlines, contact information for the Settlement Administrator, and how to obtain other case-related information.

Settlement Class Members are also able to file a Claim Form on the Settlement Website prior to the deadline. The Settlement Website address was prominently displayed in all notice documents. As of March 13, 2026, there have been 55,917 unique visitor sessions to the Settlement Website, and 101,140 web pages have been presented. The Claim Form is included as **Attachment 9**.

Toll-Free Telephone Number

31. On October 31, 2025, a toll-free telephone number was established for the Settlement (1-833-662-3703). Callers are able to hear an introductory message and have the option to learn more about the Settlement in the form of recorded answers to FAQs, and to request that a Long Form Notice be mailed to them. This automated telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was prominently displayed in all notice documents. As of March 13, 2026, there have been 606 calls to the toll-free telephone number representing 1,182 minutes of use.

32. A postal mailing address and email address were established and continue to be available, allowing Settlement Class Members the opportunity to request additional information or ask questions.

Claim Submission & Distribution Options

33. The Notices provided a detailed summary of relevant information about the Settlement, including the Settlement Website address, and how members of the Settlement Class can file a Claim Form online or by mail prior to the March 4, 2026, claims filing deadline. With any method of filing a Claim Form, members of the Settlement Class are given the option of receiving a digital payment or a traditional paper check. Epiq worked with counsel for the parties to select an appropriate menu of payment options. The type of digital payment selected does not impact Epiq's compensation for its work as the Settlement Administrator, and no digital option is discouraged relative to other options.

34. The claims filing deadline passed on March 4, 2026. As of March 13, 2026, Epiq has received 7,458 Claim Forms (6,981 online and 477 paper). This represents 1.9% of the identified Settlement Class. As standard practice, Epiq is in the process of conducting a complete quality control review of Claim Forms received. There is a likelihood that after detailed review, the total number of Claim Forms received will change due to duplicate and denied Claim Forms. For Claim Forms determined to be deficient, claimants will be sent deficiency letters with an opportunity to

cure, unless Epiq determines that they are not Settlement Class Members in which case the Claim Forms will be denied.

Request for Exclusion and Objections

35. The deadline to request exclusion from the Settlement or to object to the Settlement was February 2, 2026. As of March 13, 2026, Epiq has received one request for exclusion. As of March 13, 2026, Epiq is aware of no objections to the Settlement. The Exclusion Report is included as **Attachment 10**.

CONCLUSION

36. The Notice Plan reached approximately 99% of the identified Settlement Class with individual notice via email and/or mail. The reach was further enhanced by digital and social media notice, sponsored search listings, and a Settlement Website. In 2010, the Federal Judicial Center (“FJC”) issued a *Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide*, which is relied upon for federal cases. This Guide states that, “the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%.”⁸ Here, we have developed a Notice Plan that readily achieved a reach beyond the high end of that standard.

37. The Notice Plan as designed and implemented provided the best notice practicable under the circumstances, conformed to all aspects of Federal Rule of Civil Procedure 23 regarding notice, comported with the guidance for effective notice articulated in the Manual for Complex Litigation, Fourth and applicable FJC materials, and satisfied the requirements of due process, including its “desire to actually inform” requirement.

38. The Notice Plan schedule afforded enough time to provide full and proper notice to the Settlement Class Members before the opt-out and objection deadlines.

⁸ FED. JUDICIAL CTR, JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 17, 2026.

A handwritten signature in black ink, consisting of the letters 'C' and 'A' with a stylized flourish extending from the 'A'.

Cameron R. Azari, Esq.

Attachment 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LYNN SCOTT, LLC, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

GRUBHUB INC.,

Defendant.

Case No. 1:20-cv-06334

DECLARATION OF KYLE S. BINGHAM ON IMPLEMENTATION OF CAFA NOTICE

I, KYLE S. BINGHAM, hereby declare and state as follows:

1. My name is KYLE S. BINGHAM. I am over the age of 25 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Senior Director of Legal Noticing for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. I have overseen and handled Class Action Fairness Act (“CAFA”) notice mailings for more than 500 class action settlements.

3. Epiq is a firm with more than 25 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service (“USPS”), claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for Defendant Grubhub Inc., 52 federal and state officials (the Attorney General of the United States and the Attorneys General of each of the 50 states and the District of Columbia) were identified to receive CAFA notice.

6. Epiq maintains a list of these federal and state officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq’s list were verified, then run through the Coding Accuracy Support System (“CASS”) maintained by the United States Postal Service (“USPS”).¹

7. On September 5, 2025, Epiq sent 52 CAFA Notice Packages (“Notice”). The Notice was mailed via USPS Priority Mail to 48 officials (the Attorneys General of 47 states and the District of Columbia). As per the direction of the Office of the Nevada, New York, and Connecticut Attorneys General, the Notice was sent to the Nevada, New York, and Connecticut Attorneys General electronically via email. The Notice was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States. The CAFA Notice Service List (USPS Priority Mail, Email, and UPS) is included as **Attachment 1**.

8. The materials sent to the federal and state officials included a Cover Letter, which provided notice of the proposed Settlement of the above-captioned case. The Cover Letter is included as **Attachment 2**.

9. The cover letter was accompanied by a CD, which included the following Exhibits:

- a. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**
 - Class Action Complaint (filed October 26, 2020);

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

- First Amended Class Action Complaint (filed August 21, 2023); and
 - Consolidated Amended Class Action Complaint (filed September 24, 2024).
- b. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:**
- Claim Form (*Exhibit A to the Settlement Agreement*);
 - Postcard Notice (*Exhibit B to the Settlement Agreement*); and
 - Long Form Notice (*Exhibit C to the Settlement Agreement*).
- c. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The following documents were included:
- Plaintiffs’ Memorandum in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement;
 - Declaration of Rosemary M. Rivas in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement;
 - Class Action Settlement Agreement (*Exhibit 1 to the Rivas Declaration*);
 - Plan of Allocation (*Exhibit D to the Settlement Agreement*);
 - Gibbs Mura Firm Resume (*Exhibit 2 to the Rivas Declaration*);
and
 - FeganScott LLC Firm Resume (*Exhibit 3 to the Rivas Declaration*).
- d. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** A geographic analysis of potential Class Members was included on the CD.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 16, 2025.



KYLE S. BINGHAM

Attachment 1

CAFA Notice Service List

USPS Priority Mail

Appropriate Official	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Treg Taylor	1031 W 4th Ave	Suite 200	Anchorage	AK	99501
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Tim Griffin	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Kris Mayes	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Protection Section	455 Golden Gate Ave Suite 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway Fl 10	Denver	CO	80203
Office of the Attorney General	Brian Schwalb	400 6th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	James Uthmeier	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Anne E Lopez	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Brenna Bird	Hoover State Office Building	1305 E Walnut St	Des Moines	IA	50319
Office of the Attorney General	Raul Labrador	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	500 South Second Street		Springfield	IL	62701
Office of the Indiana Attorney General	Todd Rokita	Indiana Government Center South	302 W Washington St Rm 5	Indianapolis	IN	46204
Office of the Attorney General	Kris Kobach	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Russell Coleman	700 Capitol Ave Suite 118		Frankfort	KY	40601
Office of the Attorney General	Liz Murrill	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Andrea Campbell	1 Ashburton Pl 20th Fl		Boston	MA	02108
Office of the Attorney General	Anthony G Brown	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO BOX 30212	525 W. Ottawa St.	Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St Ste 1400		St Paul	MN	55101
Missouri Attorney General's Office	Andrew Bailey	207 West High Street	PO Box 899	Jefferson City	MO	65102
Mississippi Attorney General	Lynn Fitch	PO Box 220		Jackson	MS	39205
Office of the Attorney General	Austin Knudsen	215 N Sanders 3rd Fl	PO Box 201401	Helena	MT	59620
Attorney General's Office	Jeff Jackson	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Drew H Wrigley	600 E Boulevard Ave Dept 125		Bismarck	ND	58505
Nebraska Attorney General	Mike Hilgers	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	John Formella	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Matthew J Platkin	25 Market Street	PO Box 080	Trenton	NJ	08625
Office of the Attorney General	Raul Torrez	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Dave Yost	30 E Broad St Fl 14		Columbus	OH	43215
Office of the Attorney General	Gentner Drummond	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Dan Rayfield	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Dave Sunday	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Marty Jackley	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Jonathan Skrmetti	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	PO Box 12548		Austin	TX	78711
Office of the Attorney General	Derek Brown	Utah State Capitol Complex	350 North State Street Ste 230	Salt Lake City	UT	84114
Office of the Attorney General	Jason S Miyares	202 N 9th St		Richmond	VA	23219
Office of the Attorney General	Charity R Clark	109 State St		Montpelier	VT	05609
Office of the Attorney General	Nick Brown	800 5th Ave Ste 2000		Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	JB McCuskey	State Capitol Complex Bldg 1 Room E 26	1900 Kanawha Blvd E	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	109 State Capital		Cheyenne	WY	82002

CAFA Notice Service List

Email

Appropriate Official	Contact Format	State
Office of the Attorney General for Connecticut	All documents sent to CT AG at their dedicated CAFA email inbox.	CT
Office of the Attorney General for Nevada	All documents sent to NV AG at their dedicated CAFA email inbox.	NV
Office of the Attorney General for New York	All documents sent to NY AG at their dedicated CAFA email inbox.	NY

UPS

Appropriate Official	FullName	Address1	Address2	City	State
US Department of Justice	Pamela Bondi	950 Pennsylvania Ave NW		Washington	DC

Attachment 2

CAFA NOTICE ADMINISTRATOR

10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

September 5, 2025

VIA UPS OR USPS PRIORITY MAIL

Class Action Fairness Act – Notice to Federal and State Officials

Dear Federal and State Officials:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), codified at 28 U.S.C. § 1715, please find enclosed information from Defendant Grubhub Inc. (“Defendant”) relating to the proposed settlement of a class action lawsuit.

- **Case:** *Lynn Scott, LLC, et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334-LAH-GAF.
- **Court:** United States District Court for the Northern District of Illinois, Eastern Division.
- **Defendant:** Grubhub Inc.
- **Documents Enclosed:** In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD:
 1. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**
 - Class Action Complaint (filed October 26, 2020);
 - First Amended Class Action Complaint (filed August 21, 2023); and
 - Consolidated Amended Class Action Complaint (filed September 24, 2024).
 2. **Per 28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Court has not scheduled a preliminary approval hearing or a final approval hearing or any other judicial hearing concerning the settlement agreement at this time.
 3. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:**
 - Claim Form (*Exhibit A to the Settlement Agreement*);
 - Postcard Notice (*Exhibit B to the Settlement Agreement*); and
 - Long Form Notice (*Exhibit C to the Settlement Agreement*).
 4. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The following documents are included:
 - Plaintiffs’ Memorandum in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement;

CAFA NOTICE ADMINISTRATOR

10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

- Declaration of Rosemary M. Rivas in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement;
 - Class Action Settlement Agreement (*Exhibit 1 to the Rivas Declaration*);
 - Plan of Allocation (*Exhibit D to the Settlement Agreement*);
 - Gibbs Mura Firm Resume (*Exhibit 2 to the Rivas Declaration*); and
 - FeganScott LLC Firm Resume (*Exhibit 3 to the Rivas Declaration*).
- 5. **Per 28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** Please note that the parties to this Settlement have agreed to provide Defendants with the option to void and terminate the Settlement Agreement if, the total number of opt-outs is equal to or exceeds the number set forth in the Confidential Supplemental Agreement Regarding Exclusion Threshold, which is referenced in Section XIV.3 of the Settlement Agreement. It is typical for agreements of this nature to remain confidential because, as explained by a leading treatise on complex litigation, “[k]nowledge of the specific number of opt outs that will vitiate a settlement might encourage third parties to solicit class members to opt out.” Manual for Complex Litigation § 21.631 (4th ed.).
- 6. **Per 28 U.S.C. § 1715(b)(6) – Final Judgment or Notice of Dismissal:** To date, the Court has not issued a final order, judgment or dismissal in the above-referenced action.
- 7. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The Settlement Class means all businesses whose names or logos were used on Grubhub or any other part of the Grubhub Platform, including AllMenus, Eat24, Seamless, Tapingo, LevelUp, OrderUp, BiteGrabber, and MenuPages, from January 1, 2019 through April 30, 2024 without a contract with Grubhub. Excluded from this Settlement Class are: corporate officers, members of the board of directors, and senior management of Defendant; any and all judges, justices, and chambers’ staff assigned to hear or adjudicate any aspect of this litigation; any members of the Settlement Class that opt out prior to the opt-out deadline; any entity in which Defendant has a controlling interest, and their legal representatives, officers, directors, employees, assigns and successors; and Class Counsel and all counsel of record in the Action.

A Geographic Analysis of potential Class Members is included in the enclosed CD.
- 8. **Per 28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** To date, the Court has not issued a final order or judgment in the above-referenced action.

If you have questions or concerns about this notice or the enclosed materials, please contact this office.

Sincerely,

CAFA Notice Administrator

Enclosures

Attachment 2

From: Lynn Scott v Grubhub Settlement Administrator <noreply@RestaurantListingSettlement.com>
To: [REDACTED]
Subject: COURT ORDERED NOTICE OF CLASS ACTION SETTLEMENT

If your business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages, or BiteGrabber without a contract, you may be entitled to benefits from a Settlement.

A Court authorized this Notice. This is not a solicitation from a lawyer.

You can file your Claim Form [here](#).

Businesses may qualify for monetary compensation from a \$7,154,586 class action settlement in a lawsuit filed on behalf of businesses whose names and/or logos were listed on online food delivery platforms, including Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages, or BiteGrabber without having a contract in place.

The purpose of this Notice is to provide information about this Settlement and explain your rights and options.

Who is Included? You received this notice because your business may be a member of the group of businesses affected, called the “Settlement Class.”

What Does the Settlement Provide? As a Settlement Class Member, you can submit a Claim Form [here](#) or by mail postmarked by **March 4, 2026**, for the following benefits from the Settlement:

Cash Payment: Each Settlement Class Member who submits a valid claim will be entitled to:

1. **an initial payment of \$50;** AND
2. an additional payment that will be prorated based on the length of time the business was listed on Grubhub, BiteGrabber, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, and MenuPages.

If the total of the initial payments of all valid claims is more than the amount available, then initial payments will be reduced pro-rata (a legal term meaning equally) based on the length of time a business was listed on Grubhub.

More information is available in the [Settlement Agreement](#) or the [Long Form Notice](#).

Other Options.

Opt-Out postmarked by February 2, 2026. Submit your opt-out if you do not want to be legally bound by the Settlement. The Court will exclude any class members who request to opt-out, unless the Court decides otherwise.

Object by February 2, 2026. You may object to the Settlement if you do not opt-out. The Long Form Notice on the Settlement Website explains how to opt-out or object.

Do Nothing. You will get no benefits from the Settlement, and you will be bound by the Settlement, any judgments, and orders.

Final Approval Hearing on April 15, 2026. The Court will decide whether to approve the settlement, Class Counsel's attorneys' fees of up to 1/3 of the Settlement Fund and costs, and service awards for the Plaintiffs and will consider objections. You or your lawyer may ask to appear at the hearing but are not required to do so.

This notice is a summary. Learn more about the Settlement [here](#) or call toll free 1-833-662-3703.

Unique ID	PI N	BusinessN ame	Address
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

If [REDACTED] should not be subscribed or if you need to change your subscription information for Lynn Scott v Grubhub, [please use this preferences page](#).

Attachment 3

Restaurant Listing Settlement
Settlement Administrator
PO Box 5749
Portland, OR 97228-5749

FIRST-CLASS MAIL
PRESORTED
U.S. POSTAGE PAID
PORTLAND, OR
PERMIT NO. 2882

Court-Approved Legal Notice

If your Business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages or BiteGrabber without a contract in place, you may be entitled to benefits from a Settlement.

[Redacted]

LEARN MORE!
Scan this QR code to visit the Settlement Website.



Unique ID: [Redacted]
PIN: [Redacted]

1
1



Lawsuit Background

Businesses may qualify for monetary compensation from a \$7,154,586 class action settlement involving Grubhub Inc. ("Defendant"). The lawsuit was filed on behalf of businesses whose names and/or logos were listed on online food delivery platforms, including Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages, or BiteGrabber without a contract in place. The lawsuit asserts that Defendant listed restaurants without obtaining prior consent, allegedly leading to consumer confusion regarding restaurant affiliation and potential reputational harm and loss of sales. Grubhub Inc. denies these allegations but has agreed to settle the matter in *Lynn Scott, LLC et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334-LAH-GAF (N.D. Ill.).

Who is included? You received this notice because your business may be a member of the group of businesses affected, called the "Settlement Class."

What does the Settlement Provide?

As a Settlement Class Member, you can submit a Claim Form online or by mail postmarked by **March 4, 2026**, for the following benefits from the Settlement:

Cash Payment: Each settlement class member who submits a valid claim will be entitled to:

- 1) an initial payment of \$50 and
- 2) an additional payment that will be prorated based on the length of time the business was listed on Grubhub, BiteGrabber, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, and MenuPages.

If the total of the initial payments of all valid claims is more than the amount available, then initial payments will be reduced pro-rata (a legal term meaning equally) based on the length of time a business was listed on Grubhub.

Other Options

Opt-Out postmarked by February 2, 2026. Submit your opt-out if you do not want to be legally bound by the Settlement. The Court will exclude any class members who request to opt-out, unless the Court decides otherwise.

Object by February 2, 2026. You may object to the Settlement if you do not opt-out. The Long Form Notice on the Settlement Website explains how to opt-out or object.

Do Nothing. You will get no benefits from the Settlement, and you will be bound by the Settlement, any judgments, and orders.

Final Approval Hearing on April 15, 2026. The Court will decide whether to approve the settlement, Class Counsel's attorneys' fees of up to 1/3 of the Settlement Fund and costs, and service awards for the Plaintiffs and will consider objections. You or your lawyer may ask to appear at the hearing but are not required to do so.

This notice is a summary. Learn more at www.RestaurantListingSettlement.com, or call toll-free 1-833-662-3703.

AL0602 v.01

Restaurant Listing Settlement
Submit your Claim Form by **March 4, 2026**

Submit Your Claim
Scan here or visit
www.RestaurantListingSettlement.com



Attachment 4



United States District Court
for the Northern District of Illinois

Lynn Scott, LLC et al. v. Grubhub Inc.

Case No. 1:2020-cv-06334

Class Action Notice

Authorized by the U.S. District Court

Was your business listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages, or BiteGrabber without a contract in place?

There is a \$7,154,586 settlement of a lawsuit.

And you may be entitled to money.

To be part of this settlement, you should:

Read this notice.

Respond by March 4, 2026 by mail or online.

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- You can learn more at: www.RestaurantListingSettlement.com.

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Lynn Scott, LLC et al. v. Grubhub Inc.*, brought on behalf of businesses that were listed on several online food delivery platforms (Grubhub, Eat24, Tapingo, OrderUp, Seamless, LevelUp, AllMenus, MenuPages and BiteGrabber) without a contract in place. **You received this notice because your business may be a member of the group of businesses affected, called the “class.”** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Submit a Claim Form	Settlement Class Members can submit a Claim Form online or by mail to potentially share in the benefits of this Settlement. You will be bound by the settlement if you receive a payment.
Do Nothing	Get no payment. Give up rights resolved by settlement.
Opt Out	Get no payment. Allows you to pursue all your legal rights and remedies based on the same issues.
Object	Tell the Court why you don't like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **February 2, 2026**
 Settlement approval hearing: **April 15, 2026**
 Your deadline to file a Claim: **March 4, 2026**

Learning About the Lawsuit

What is this lawsuit about?

In October 2020, a class action lawsuit was filed against Grubhub. The lawsuit was brought on behalf of businesses whose names or logos were listed on the following online food delivery platforms affiliated with Grubhub Inc., including Grubhub, Eat24, Tapingo, OrderUp, Seamless, LevelUp, AllMenus, MenuPages, and BiteGrabber, without a contract with those businesses. The lawsuit claims that thousands of businesses were added to food ordering and delivery apps without a contract in place. According to Plaintiffs' complaint, consumers believed the businesses had a contract with Grubhub when they did not, which allegedly hurt the businesses' reputations, and caused them to lose sales.

Grubhub denies that it did anything wrong, and Plaintiffs have not proven that Grubhub has done anything wrong.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at: RestaurantListingSettlement.com.

Why is there a settlement in this lawsuit?

In May 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation. The settlement is not an admission of guilt by Grubhub or any of the other food ordering and delivery platforms.

The settlement is on behalf of the businesses who brought the case and all members of the nationwide settlement class, which includes all businesses whose names or logos were listed on Grubhub, Eat24, Tapingo, OrderUp, Seamless, LevelUp, AllMenus, MenuPages, BiteGrabber, without having a contract in place. The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

Where:

United States District Court
for the Northern District of Illinois
Everett McKinley Dirksen United States Courthouse – Courtroom 1425
219 South Dearborn Street
Chicago, IL 60604.

When: April 15, 2026, at 10:00 a.m.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.RestaurantListingSettlement.com.

Learning About the Settlement

What does the settlement provide?

The settlement pays money to businesses who were listed on the Grubhub food delivery platforms when those businesses did not have a contract. Grubhub has also agreed not to list businesses on those platforms in the future without a contract.

An amount of \$7,154,586 will be paid into a settlement fund. Businesses will receive an initial payment of \$50 (which may be increased or reduced depending on the total number of valid claims

submitted) and an additional payment pro rata based on the length of time they were listed on the platforms listed above without a contract in place. The settlement fund will also be used to pay for costs and fees approved by the Court, including the cost of administering this settlement (expected to be approximately \$375,000).

Members of the settlement class will “release” their claims as part of the settlement, which means they relinquish all claims against Grubhub Inc. based on the same issues in this lawsuit. The full terms of the release can be found at www.RestaurantListingSettlement.com.

How do I know if I am part of this settlement?

If your business was listed on one of the food ordering and delivery platforms listed above and your business did not have a contract when listed, you may be a member of the class and entitled to money. Business records suggest your business may be part of the class. To verify whether your business is a member of the class, you may contact the settlement administrator.

How much will my payment be?

Your payment amount depends on how long your business was listed on Grubhub, Eat24, Tapingo, OrderUp, Seamless, LevelUp, AllMenus, MenuPages, or BiteGrabber, without a contract in place.

Each settlement class member who submits a claim will be entitled to an initial payment of \$50 and an additional payment that will be prorated and based on the length of time the business was listed on any of the platforms listed above without a contract. Business records will be used to confirm the length of time on the platform.

If the total of the initial payments exceeds the total amount of funds available, payments will be reduced on a pro rata basis and the length of time a business was on one of the platforms without a contract in place.

If there is money left over that can be distributed in an administratively feasible way, a second distribution will be made, otherwise the remaining balance will be donated to an organization that is approved by the Court.

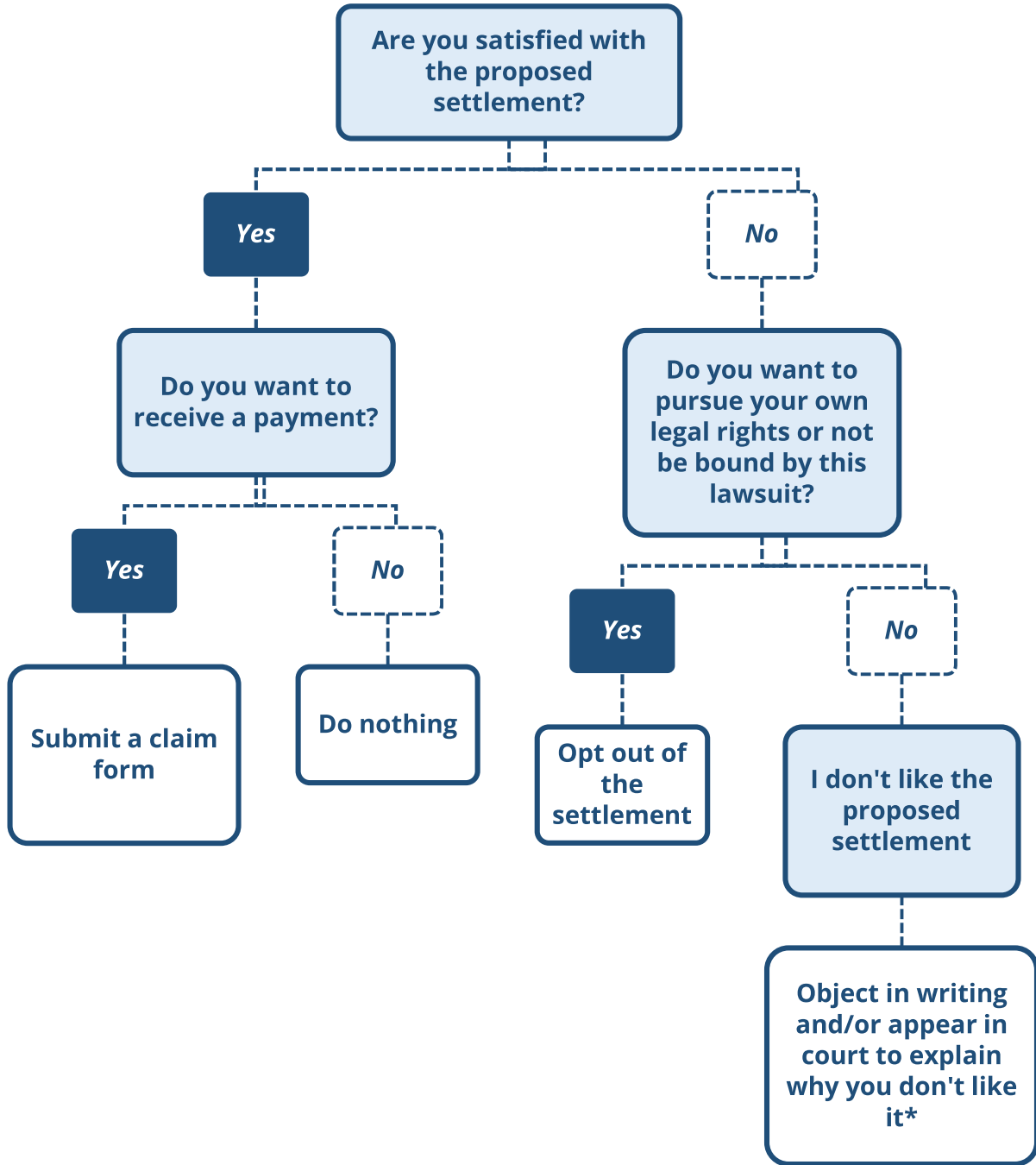
Deciding What to Do

How do I weigh my options?

You have four options. You can stay in the settlement and submit a claim, you can opt out of the settlement, you can object to the settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own rights if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

What is the best path for me?



**You can object to the settlement AND submit a claim form to receive payment.*

Submitting a Claim

How do I get a payment if I am a class member?

If you wish to receive money, you must submit a completed claim form to the Settlement Administrator either online at www.RestaurantListingSettlement.com or download a claim form from the website and mail it to the Settlement Administrator (address below). If you are a Grubhub partnered restaurant as of July 18, 2025, you only need to provide your contact information, select a payment method and sign. If you are not a Grubhub partner as of July 18, 2025, you also need to provide your EIN or Federal Tax Identification Number. Your EIN is requested to prevent fraud and will be kept confidential.

Lynn Scott v Grubhub
Settlement Administrator
PO Box 5749
Portland, OR 97228-5749

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following firms and lawyers.

Your lawyers:

Firms	Lawyers
Gibbs Mura LLP	Rosemary M. Rivas
Fegan Scott LLC	Elizabeth A. Fegan

These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

Your lawyers have worked on the case since 2020 and to date, they have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment not to exceed 33 1/3 % of the Settlement Funds (up to \$2,382,477) total in attorneys' fees plus the reimbursement of out-of-pocket expenses not to exceed \$150,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of up to \$20,000.00 to each Class Representative for the time and effort they contributed to the case over approximately five years. If approved by the Court, this will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to pursue your own legal rights and remedies that you may have.

How do I opt out?

To opt out of the settlement, you must submit a written letter to the address or email address below no later than **February 2, 2026**:

Lynn Scott v Grubhub
Settlement Administrator
PO Box 5749
Portland, OR 97228-5749
833-662-3703
info@RestaurantListingSettlement.com

Be sure to include your name, the name of your business(es), address and contact information, and signature.

Any request for exclusion shall (i) state for each entity requesting exclusion, the entity's full name, physical address, email address, and phone number,

(ii) the name of the Action (*Lynn Scott, LLC, et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334-LAH-GAF (N.D. Ill.)),

(iii) a specific statement of the entity's intent to be excluded from the Settlement,

(iv) the identity of the entity's counsel, if represented, and

(v) the printed name and signature of the entity's authorized representative and the date on which the request was signed.

Failure to provide each required element may result in rejection of a request for exclusion.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must electronically file or mail a letter to the Court, and mail a letter to the Settlement Administrator, no later than

February 2, 2026 that includes:

- (1) the name and case number of this lawsuit, *Lynn Scott, LLC, et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334-LAH-GAF (N.D. Ill.);
- (2) the class member's business name, physical address, email address and phone number (if you have one);
- (3) the full name of the individual submitting the comment or objection on behalf of the class member and, if the class member is not a natural person, a description of the individual's authority to act on behalf of the class member;
- (4) whether the objection applies only to the objector, to a specific subset of the class, or to the entire class;
- (5) all reasons for the objection or comment and sufficient proof establishing that the individual is the proprietor of the class member;
- (6) a statement identifying all class action settlements the proprietor of the class member or their attorney has objected to or commented on in the last five (5) years;
- (7) whether the class member intends to appear at the Final Approval Hearing;
- (8) the name and contact information of any and all attorneys representing, advising, or assisting the class member, including any counsel who may be entitled to compensation for any reason related to the objection or comment;
- (9) whether any attorney will appear on the class member's behalf at the Final Approval Hearing, and if so the identity of that attorney; and
- (10) the signature of the proprietor of the class member.

The addresses for the Court and the Settlement Administrator are below. If sent by mail, to be timely the objections must be postmarked no later than **February 2, 2026**.

<p>Lynn Scott v Grubhub Settlement Administrator PO Box 5749 Portland, OR 97228-5749 833-662-3703</p>	<p>The Honorable LaShonda A. Hunt United States District Court for the Northern District of Illinois Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, IL 60604</p>
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Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will not get any money, but you will still be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any legal proceedings about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found at www.RestaurantListingSettlement.com.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found at www.RestaurantListingSettlement.com. To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at www.RestaurantListingSettlement.com

Resource	Contact Information	
Case website	www.RestaurantListingSettlement.com	
Settlement Administrator	Lynn Scott v Grubhub Settlement Administrator PO Box 5749 Portland, OR 97228-5749 833-662-3703	
Your Lawyers	Rosemary M. Rivas Gibbs Mura LLP 1111 Broadway, Suite 2100 Oakland, CA 94607	Elizabeth A. Fegan Fegan Scott LLC 150 S. Wacker Dr., 24 th Floor Chicago, IL 60606

Attachment 5

If your Business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages or BiteGrabber without a contract,



- DINING OUT >
- AT HOME >
- CULTURE >
- TRAVEL >

EATER



EATER.COM

The Latest

23 MINUTES AGO **EATER NY**
Dine Among the Stars at A24's New NYC Theater Restaurant Wild Cherry

AN HOUR AGO **EATER LA**
This Torrance Drinking Den Is the South Bay's Best Japanese Izakaya

TWO HOURS AGO **EATER ATLANTA**
Where to Eat Dessert-Only Tasting Menus and Other Sweet Treats in Atlanta

9:24 AM EST **EATER CAROLINAS**
After Nine Years in Charleston, the Darling Oyster Bar Opens Second Location in Savannah

OCT 31 **EATER SAN DIEGO**
The Best San Diego Pie Shops and Purveyors



HOLIDAY GIFT GUIDES

17 Very Cool Food Gifts to Buy Before They Sell Out

Including a rare collaboration from Big Sur Bakery, a sleek Japanese toaster oven, and a luxury chocolate chess set

By FRANCKY KNAPP



TRAVEL GUIDES

For Lisbon, the Pastel de Nata is a Gift and a Curse

By RAFAEL TONON



PORTLAND RESTAURANT CLOSINGS

EATER PORTLAND

Portland's Last Lesbian Bar Doc Marie's Closes on Halloween

By DIANNE DE GUZMAN

Where to Eat: Fall Back in Time



TRAVEL GUIDES

Colonial Williamsburg Feeds a Historic Moment

By NICK MANCALL-BITEL



TRAVEL GUIDES

Once Again, Goa's Taverns Are the Place to Be

By JOANNA LOBO



TRAVEL GUIDES

In Search of Japan's Iconic Yakult Lady

By NINA LI COOMES



TRAVEL GUIDES

Vienna's Vollpension Cafe Is Like a Visit to Grandma's House



EATER AT HOME

A New Cookbook Compiles Recipes From Gravestones Around the

you may be entitled to benefits from a Settlement.

Learn More



- DINING OUT >
- AT HOME >
- CULTURE >
- TRAVEL >

EATER



EATER.COM

The Latest

23 MINUTES AGO **EATER NY**
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AN HOUR AGO **EATER LA**
 This Torrance Drinking Den Is the South Bay's Best Japanese Izakaya

TWO HOURS AGO **EATER ATLANTA**
 Where to Eat Dessert-Only Tasting Menus and Other Sweet Treats in Atlanta

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 After Nine Years in Charleston, the Darling Oyster Bar Opens Second Location in Savannah

OCT 31 **EATER SAN DIEGO**
 The Best San Diego Pie Shops and Purveyors



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By RAFAEL TONGAN



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Portland's Last Lesbian Bar Doc Marie's Closes on Halloween

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Where to Eat: Fall Back in Time



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Colonial Williamsburg



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Once Again, Goa's Taverns



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In Search of Japan's Iconic



TRAVEL GUIDES

Vienna's Vollkorn Cafe



EATER AT HOME

A New Cookbook



Restaurants

FOOD Nov 1, 2025, 5:12 AM ET

Gen Z diners are turning to social media to discover restaurants over Yelp and Michelin

For Gen Z and millennials, choosing a restaurant is less about Michelin stars or Yelp averages and more about what's in their social media feeds.



RETAIL Oct 29, 2025, 6:39 PM ET

Starbucks' turnaround effort is making gains thanks to protein

Starbucks introduced protein cold foam and protein-infused lattes in September. The options are helping win over some infrequent Starbucks customers.



FOOD Oct 29, 2025, 9:07 AM ET

10 of the most haunted restaurants in the US

If you're looking for a distinct dining experience this Halloween, these haunted restaurants serve some delicious dishes with a side of spookiness.



FOOD Oct 27, 2025, 11:02 AM ET

I worked as a chef in Philadelphia. Here are the 10 restaurants I always recommend to first-time visitors.

The Pennsylvania city has the best hoagies and ramen, plus authentic Italian, Mexican, and Japanese restaurants I suggest to first-time visitors.



AD

If your Business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages or BiteGrabber without a contract, you may be entitled to benefits from a Settlement.

[Learn More](#)



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If your Business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages or BiteGrabber without a contract, you may be entitled to benefits from a Settlement. Learn more.



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Attachment 6

Lynn Scott, LLC et al. v. Grubhub Inc.

Sponsored Search Keyword List

Keywords (targets plural, singular, and re-ordered versions of keywords)

Grubhub restaurant settlement	Eat24 listing without permission
Grubhub class action	Tapingo unauthorized listing
Grubhub settlement	Tapingo no contract
Eat24 settlement	Tapingo listing without contract
Tapingo settlement	Tapingo listing without permission
OrderUp settlement	OrderUp unauthorized listing
LevelUp settlement	OrderUp no contract
Seamless settlement	OrderUp listing without contract
AllMenus settlement	OrderUp listing without permission
MenuPages settlement	LevelUp unauthorized listing
BiteGrabber settlement	LevelUp no contract
Grubhub class action settlement	LevelUp listing without contract
Eat24 class action settlement	LevelUp listing without permission
Tapingo class action settlement	Seamless unauthorized listing
OrderUp class action settlement	Seamless no contract
LevelUp class action settlement	Seamless listing without contract
Seamless class action settlement	Seamless listing without permission
AllMenus class action settlement	AllMenus unauthorized listing
MenuPages class action settlement	AllMenus no contract
BiteGrabber class action settlement	AllMenus listing without contract
Food delivery unauthorized listing	AllMenus listing without permission
Food delivery listing without contract	MenuPages unauthorized listing
Food delivery listing without permission	MenuPages no contract
Grubhub unauthorized listing	MenuPages listing without contract
Grubhub no contract	MenuPages listing without permission
Grubhub listing without contract	BiteGrabber unauthorized listing
Grubhub listing without permission	BiteGrabber no contract
Eat24 unauthorized listing	BiteGrabber listing without contract
Eat24 no contract	BiteGrabber listing without permission
Eat24 listing without contract	

Attachment 7



Grubhub class action



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Sponsored result

restaurantlistingsettlement.com
<https://www.restaurantlistingsettlement.com>

Grubhub Restaurant Settlement | No Contract Business Listing

Businesses listed on food delivery sites without a contract may be included.
Grubhub/Eat24/Tapingo/OrderUp/LevelUp/Seamless/AllMenus/MenuPages/BiteGrabber included.

Hide sponsored result ^

Grubhub Securities Litigation
<https://grubhubsecuritieslitigation.com>

Grubhub Securities Litigation

This website has been established to provide general information related to the proposed settlement of the lawsuit referred to as Azar v. Grubhub, Inc.

Federal Trade Commission (.gov)
<https://www.ftc.gov/news/press-releases/2024/12>

FTC, Illinois Attorney General Take Action Against Grubhub ...

Dec 17, 2024 – Grubhub will pay \$25 million to settle charges from the Federal Trade Commission and the Illinois Attorney General that the food delivery firm engaged in an ...

People also ask :

Is there a class action lawsuit against Grubhub?

What is the average payout for a class action settlement?

Can I still join the class action lawsuit?

How to join Grubhub lawsuit?

[Feedback](#)

CBS News
<https://www.cbsnews.com/CBS-Chicago-Local-News>

Grubhub to pay \$25 million to settle claims of deceiving ...

Dec 17, 2024 – A federal lawsuit filed by the FTC and Raoul's office accuses Grubhub of baiting with low delivery fees, only to tack on additional fees often ...



Grubhub restaurant settlement



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Grubhub Restaurant Settlement - No Contract Business Listing

Businesses listed on food delivery sites without a contract may be included.
Grubhub/Eat24/Tapingo/OrderUp/LevelUp/Seamless/AllMenus/MenuPages/BiteGrabber...



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get.grubhub.com

Become A Restaurant Partner - Grubhub For Merchants

Join Hundreds Of Thousands Of Merchants Growing Their Businesses With Grubhub. Grow Profit Potential And Reach More Customers. Sign Up To Offer Delivery And Pickup.

Easy Merchant Portal

How To Sign In

FAQs

Pricing Packages



Top Class Actions
topclassactions.com › lawsuit-settlements › consumer

Grubhub to pay \$25M settlement over allegations of deceiving ...

Dec 23, 2024 · Grubhub will pay \$25 million and overhaul its business practices to resolve allegations from the Federal Trade Commission and the Office of the Illinois Attorney General.



Grubhub
about.grubhub.com › news › grubhub-reaches

Grubhub reaches settlement with the FTC

Dec 17, 2024 · While we categorically deny the allegations made by the FTC, many of which are wrong, misleading or no longer applicable to our business, we believe settling this matter is in...

Videos

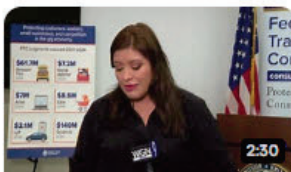


YouTube

Grubhub reaches \$25M settlement with Illinois, FTC

Dec 17, 2024

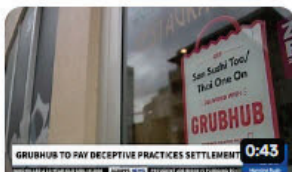
890 Views



Microsoft News

Grubhub accused of falsely adding restaurants, tricking customers and...

Jun 12, 2025



Microsoft News

Grubhub Agrees to \$25M Settlement Over Misleading Practices

Sep 13, 2025

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Searches related to Grubhub restaurant settlement



Grubhub restaurant settlement

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https://www.restaurantlistingsettlement.com :

Grubhub Restaurant Settlement - No Contract Business Listing

Sponsored Businesses listed on food delivery sites without a contract may be included.
Grubhub/Eat24/Tapingo/OrderUp/LevelUp/Seamless/AllMenus/MenuPages/BiteGrabber included.



A \$25 million

Grubhub has agreed to pay a \$25 million settlement to resolve allegations from the Federal Trade Commission and the Illinois Attorney General's office. The settlement stems from claims that Grubhub misled customers about delivery costs and deceived drivers about their earnings potential. Additionally, the company was accused of

Read more

Related searches for Grubhub

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Top Class Actions

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NBC News
https://www.nbcnews.com > business > business-news

Grubhub to pay \$25 million to settle charges it ...

Dec 17, 2024 · Grubhub will pay \$25 million to settle charges it misled customers about the cost of their delivery and drivers about how much ...



Reuters
https://www.reuters.com > legal > government

Grubhub agrees to pay restaurants \$7 million in ...

Aug 27, 2025 · Online food delivery platform Grubhub has agreed to pay \$7.1 million to settle a class action that accused the company of falsely ...



Attachment 8

From: Lynn Scott v Grubhub Settlement Administrator <noreply@RestaurantListingSettlement.com>
To: [REDACTED]
Subject: Court Ordered Notice of Class Action Settlement

REMINDER NOTICE

If your Business was listed on Grubhub, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, MenuPages or BiteGrabber without a contract in place, you may be entitled to benefits from a Settlement.

Records indicate you have not yet filed your Claim for your share of the \$7,154,586 cash Settlement.

Submit your Claim by March 4, 2026.

For your unique claim filing information, see below or [click here](#).

Submit Your Claim

Records indicate you have not yet filed a Claim for the *Lynn Scott, LLC, et al. v. Grubhub Inc.*, Case No. 1:20-CV-06334-LAH-GAF (N.D. Ill.), class action Settlement. **You must submit a Claim by March 4, 2026**, to receive a cash payment from the \$7,154,586 cash Settlement.

The lawsuit was filed on behalf of businesses whose names or logos were listed on the above food ordering and delivery platforms without a contract in place. According to the complaint, consumers believed the businesses had a contract with Grubhub when they did not, which allegedly hurt the businesses' reputations and caused them to lose sales.

Records show you are a Settlement Class Member and have not yet submitted a Claim for a cash payment from the \$7,154,586 cash Settlement.

Submit your Claim by **March 4, 2026**, for the following benefits:

Initial Cash Payment

Receive an initial payment of **\$50**.

AND

Additional Cash Payment

Receive an additional cash payment.

The additional cash payment will be prorated based on the number of claims and the length of time your business was listed on Grubhub, BiteGrabber, Eat24, Tapingo, OrderUp, LevelUp, Seamless, AllMenus, and MenuPages.

If the total of the initial payments of all valid claims is more than the amount available, then initial payments will be reduced pro-rata (a legal term meaning equally) based on the length of time a business was listed on the above food ordering and delivery platforms.

How do I make a Claim?

File your claim [here](#) or by mail postmarked by **March 4, 2026**. Filing a claim is easy and only takes a few minutes by inputting your Unique ID & PIN.

This notice is a summary. Learn more [here](#) or call toll-free 1-833-662-3703.

Your Unique Information

UniqueID	PIN	BusinessName

Submit Your Claim

If [REDACTED] should not be subscribed or if you need to change your subscription information for Lynn Scott v Grubhub, please use this preferences page.

Attachment 9

**Your Claim Form
must be submitted
online or
received by:
March 4, 2026**

Lynn Scott, LLC, et al. v. Grubhub Inc.
Case No. 1:20-CV-06334-LAH-GAF
United States District Court, Northern District of Illinois
Restaurant Listing Settlement Claim Form

Claim

IV. ATTESTATION & SIGNATURE

By signing below and submitting this Claim Form, I hereby declare that the above information is true and correct to the best of my recollection.

[Signature Line]

Signature

Date

--	--

 -

--	--

 -

--	--	--	--

MM DD YYYY

[Printed Name Line]

Printed Name

Mail your completed Claim Form to:
Lynn Scott v Grubhub Settlement Administrator, PO Box 5749, Portland, OR 97228-5749

**QUESTIONS? VISIT www.RestaurantListingSettlement.com
OR CALL TOLL-FREE 1-833-662-3703**

Attachment 10



Exclusion Report
Lynn Scott, LLC, et al. v. Grubhub Inc.

Number	Name	Date Received	Status
1	OMAR ROMERO	3/2/2026	LATE