

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BENSON GITHIEYA, *et al.*,

Plaintiffs,

v.

GLOBAL TEL*LINK CORP.,

Defendant.

CIVIL ACTION NO:
1:15-CV-00986-AT

PLAINTIFFS' NOTICE OF FILING

Per the Court's request at the teleconference on December 10, 2021, Plaintiffs hereby file the following supplemental class notice materials in support of their Unopposed Motion for Preliminary Approval. Plaintiffs respectfully request the Court approve these forms of notice in connection with its order preliminarily approving the settlement and directing the form of notice to be issued to the class.

- Prison Legal News Advertisement (attached hereto as Exhibit A).¹
- Social Media Advertisement Content (attached hereto as Exhibit B).

[signature on next page]

¹ This version replaces and supersedes Exhibit F to the Declaration of Tiffany Janowicz [dkt. 326-3], by adding "or to File a Claim" in bold font to the bottom of the advertisement.

Respectfully submitted this 14th day of December, 2021.

/s/ Michael A. Caplan

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Plaintiffs' and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that, on this day, I caused a true and correct copy of the foregoing document to be filed with the clerk's office using this Court's CM/ECF system, which will automatically send notice of such filing to all counsel of record.

This 14th day of December, 2021.

/s/ Michael A. Caplan

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Exhibit A

**Did you use Global Tel*Link services
to receive inmate phone calls
between 2011 and 2021?**

You could get benefits from a settlement

There is a class action Settlement with Global Tel*Link (“GTL”). The lawsuit claims that GTL improperly retained money that was deposited in prepaid “AdvancePay” accounts after the account was inactive for 180 days or less. GTL denies any and all wrongdoing of any kind, and denies any liability.

Who is included in the Settlement?

The Class includes anyone who (1) established and initially funded a prepaid account through GTL’s automated telephone system (also called interactive-voice-response or IVR) and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

What does the Settlement provide?

GTL will provide up to \$67 million that will pay (1) credits/refunds to eligible Class Members, (2) the costs of notice and administration, (3) attorneys’ fees and costs, and (4) special service payments to Class Representatives. GTL has also agreed to change its Inactivity Policy to benefit Class Members and others. Additional details are in the Settlement Agreement available on the website.

How can I get a payment?

If you have an active GTL AdvancePay account at the time the Settlement is finally approved in mid to late 2022, you will receive an automatic credit to your account. If you have or will have an inactive GTL AdvancePay account at the time the Settlement is approved, you need to submit a Claim Form online or by mail by **Month XX, 2022** to receive a refund. If you are not sure you will continue to use your GTL AdvancePay account through 2022, you should file a claim. Anyone who has both active and inactive GTL AdvancePay accounts will receive an automatic credit on the active account but will need to file a claim for their inactive account(s) to get a refund.

GTL will credit or refund 100% of the amount that GTL retained from your account due to inactivity. Payments to former customers may be reduced if the total credits/refunds exceed the available Settlement fund.

What are my rights?

Even if you do nothing, you will be bound by the Court’s decisions. Former GTL customers who do nothing will receive no refund (unless they reactivate their account within two years of final approval and funds remain available, in which case they may be eligible to receive a credit). If you want to keep your right to sue GTL yourself, you must exclude yourself from the Settlement by **Month XX, 2022**. If you stay in the Settlement but do not agree with the terms, you may object to it by **Month XX, 2022**.

The Court will hold a hearing on **Month XX, 2022** to consider whether to approve the Settlement, a request for attorneys’ fees and costs up to \$18,675,000, and special service payments of \$25,000. You or your lawyer may appear and speak at the hearing at your own expense.

For More Information or to File a Claim:

1-8XX-XXX-XXXX
www.XXXXXX.com

Exhibit B

SOCIAL MEDIA ADS

These ads show up in a user's feed along with the content that they see from people/groups/hashtags/pins that they follow. When a user clicks anywhere on the ad, they are taken to the case website. Ads will include an image.

Promoted Facebook Post

This is an important message for anyone who set up and funded, through an automated telephonic system, a prepaid account with used Global Tel*Link services ("GTL") to receive inmate phone calls between 2011 and 2021. You could receive money or other benefits from a settlement involving monies retained under GTL's policy of deeming accounts inactive due to 90-180 days of inactivity. For more information or to file a claim visit: GTLPrePaidSettlement.com or call: 1-833-630-1412. Claims must be filed by **Month XX, 2022**.

Standard Response to Comments:

Please visit the website, GTLPrePaidSettlement.com, or call 1-833-630-1412 for more information or to file a claim.

Facebook News Feed Ads

Specifications (includes space):

Headline: 40 characters

Body: 125 characters

Link Description: 50 characters

Version 1

Headline: Global Tel*Link services settlement (35)

Body: Did you receive inmate phone calls from 2011 to 2021? You could get money or other benefits from a settlement. (110)

Link Description: Claims must be filed by **Month XX, 2022**. (~40)

Instagram Ads

Specifications (includes space): 2200 Characters (recommend 300 or less characters)

Version 1

Set up and fund a prepaid account through a Global Tel*Link automated telephone service to receive inmate phone calls between 2011 and 2021? You could get money or other benefits from a settlement. For more information or to file a claim visit: GTLPrePaidSettlement.com. Claims must be filed by **Month XX, 2022**. (~265)