

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

PRESTON KYLES,

Plaintiff,

v.

PAPA JOHN'S INTERNATIONAL,  
INC. et al.,

Defendants.

Case No. 1:20-cv-07146

Hon. John Robert Blakey

**DECLARATION OF THOMAS R. KAYES  
IN SUPPORT OF MOTION FOR FINAL APPROVAL**

Pursuant to 28 U.S.C. § 1746, I, Thomas R. Kayes, hereby declare and state as follows:

1. I am an attorney admitted to practice in the State of Illinois. I am of counsel at Loevy + Loevy, which represents Plaintiff and the proposed Class in this matter.

2. I make this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I am over 18 and am fully competent to make this declaration. This declaration is based upon my personal knowledge, except where expressly noted otherwise.

***Background and Experience***

3. I graduated magna cum laude and order of the coif from the Northwestern University Pritzker School of Law in 2013.

4. After graduation, I worked on complex litigation as a law clerk for Judge Richard C. Tallman on the Ninth Circuit Court of Appeals, as a law clerk for Judge Edmond E. Chang on the United States District Court for the Northern District of Illinois, as an associate at Sidley Austin LLP, and as an associate at Keller Lenkner LLC (now known as Keller Postman LLC).

5. I left Keller Postman to found the Civil Rights Group, LLC (which was formerly known as the Law Office of Thomas R. Kayes, LLC). While running the Civil Rights Group, LLC, I was extensively involved in litigating dozens of BIPA class actions in state and federal courts. I joined Loevy + Loevy in May of 2024.

6. I have been appointed class counsel in *Tapia-Rendon v. United Tape & Finishing Co. Inc.*, No. 21-cv-3400, 2023 WL 5228178 (N.D. Ill. Aug. 15, 2023), *reconsideration denied*, No. 21-cv-3400, 2024 WL 406513 (N.D. Ill. Feb. 2, 2024) (BIPA class action against fingerprint-timeclock vendor); *Hosch v. DryBar Holdings LLC*, No. 2021-CH-01976 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Rivera v. Am. Freedom Ins. Co.*, No. 2020-CH-06596 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Bertasiute v. The Hari Group, Inc., et al.*, No. 2020-CH-07055 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Walleye Trading LLC v. AbbVie Inc. et al.*, No. 1:18-cv-05114 (N.D. Ill.) (federal securities class action); and *Dobbey, et al., v. Studer, et al.*, No. 13-cv-1068 (N.D. Ill.) (civil rights class action).

7. Loevy + Loevy has substantial experience in BIPA litigation. A team from the firm tried the first and, so far, only class jury trial involving BIPA, securing a \$228 million judgment.

8. Loevy + Loevy has the resources necessary to continue vigorously pursuing the Settlement Class's claims.

9. I am unaware of any objection by any class member or state or federal official to the settlement or to Plaintiff's motion for attorneys' fees, costs, and incentive award.

10. Based on the experience detailed above and my review of the facts of this case and participation in settlement negotiations, I believe the settlement to offer excellent relief for the class.

11. Plaintiff has no familial or close personal relationship with me, or with any employee at Loevy + Loevy or The Civil Rights Group, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 4, 2026, in Deerfield, Illinois.



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Thomas R. Kayes