

## **NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT**

### **If Bell Flavors & Fragrances, Inc. (“Bell Flavors”) Notified You of a Security Incident, You May Be Eligible for Benefits From A Class Action Settlement.**

*This is not a solicitation from a lawyer, junk mail, or an advertisement. A court authorized this Notice.*

This Notice summarizes the proposed Settlement reached in a lawsuit entitled *Coleen Schiller, et al. v. Bell Flavors & Fragrances, Inc.* (Case No. 2024CH07447) filed on August 8, 2024, in the Circuit Court of Cook County, Illinois (the “Action”). For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at [www.SchillerSettlement.com](http://www.SchillerSettlement.com) or by contacting the Settlement Administrator at 1-800-657-8185.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

**This Notice explains the nature of the Action and claims being settled, your legal rights, and the benefits to the Settlement Class.**

**This notice may affect your rights – please read it carefully.**

- The Action alleges that on or about July 30, 2023, Bell Flavors & Fragrances, Inc. (“Bell Flavors”) experienced an attack by cybercriminals. After an investigation, Bell Flavors became aware that cybercriminals may have gained access to and/or acquired copies of certain files from portions of its network which may have contained personal identifiable information (“PII”) including names, addresses, Social Security numbers, driver’s license numbers, passport numbers, medical information, and/or information related to enrollment in Bell’s employee benefits plan such as health insurance member ID number (the “Security Incident”). Bell Flavors maintains that it had meritorious defenses, and it was prepared to vigorously defend the Action. The settlement is not an admission of any fault, liability, or wrongdoing or an indication that Bell Flavors has violated any laws, but rather the resolution of disputed claims.
- If you received this Notice, you have been identified as a Settlement Class Member. More specifically, you are a Settlement Class Member because you have been identified by the Settlement Administrator as an individual who received notice from Bell Flavors regarding information that was potentially compromised in the Security Incident.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) reimbursement for Documented Out-of-Pocket Losses such as fees for credit reports, credit monitoring, or other identity theft insurance products, (2) reimbursement for up to five (5) hours of lost time spent dealing with the Security Incident calculated at the rate of \$20 per hour (for a total of \$100.00), and (3) the option to enroll in two years of three-bureau credit monitoring provided through LifeLock Defender Preferred, which includes up to \$1,050,000 in identity theft coverage, consisting of up to \$25,000 for reimbursement of stolen funds, up to \$25,000 for reimbursement of personal expenses, and up to \$1 million for legal and expert fees.

**The deadline to submit a claim is October 23, 2025.**

| <b>YOUR LEGAL RIGHTS &amp; OPTIONS IN THIS SETTLEMENT</b> |  |
|---|--|
| <b>Submit a Claim</b>                                     | <b>You must submit a valid Claim to get money from this Settlement.</b><br>Claim Forms must be submitted online by <b>October 23, 2025</b> or, if mailed, postmarked no later than <b>October 23, 2025</b> .   |
| <b>Do Nothing</b>   | If you do nothing, you remain in the Settlement.<br>You give up your rights to sue and you will not get any money or credit monitoring.  |
| <b>Exclude Yourself</b>                                   | <b>Get out of the Settlement. Get no money. Keep your rights.</b><br>This is the only option that allows you to keep your right to sue about the claims in this Action. You will not get any money or credit monitoring from the Settlement.<br>Your request to exclude yourself must be postmarked no later than September 23, 2025.                              |
| <b>File an Objection</b>                                  | Stay in the Settlement, but tell the Court why you think the Settlement should not be approved.<br>Objections must be postmarked no later than September 23, 2025.   |
| <b>Go to a Hearing</b>                                    | You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details.<br>The Final Approval Hearing is scheduled for October 15, 2025 at 1:30 p.m., at the Circuit Court of Cook County, located in Courtroom 2510 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602. |

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## BASIC INFORMATION

### 1. How do I know if I am affected by the Action and Settlement?

You are a Settlement Class Member if Bell Flavors identified you as being among those individuals potentially impacted by the Security Incident, including all who were sent a notice of the Security Incident.

The Settlement Class specifically excludes: (i) Bell Flavors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Security Incident or who pleads *nolo contendere* to any such charge.

This Notice explains the nature of the Action and claims being settled, your legal rights, and the benefits to the Settlement Class.

### 2. What is this Action about?

This case is known as *Coleen Schiller, et al. v. Bell Flavors & Fragrances, Inc.*, Case No. 2024CH07447 filed on August 8, 2024, in the Circuit Court of Cook County, Illinois. The person who sued is called the “Plaintiff” and the company they sued, Bell Flavors, is known as the “Defendant” in this case. Bell Flavors will be called “Defendant” in this Notice.

Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of anyone who’s personally identifiable information (“PII”) was potentially impacted as a result of the Security Incident.

This Action arises out of unauthorized access to Defendant’s systems and certain files potentially containing sensitive information about Bell Flavors’s current and former employees, including names, addresses, Social Security numbers, driver’s license numbers, passport numbers, medical information, and/or information related to enrollment in Bell’s employee benefits plan such as health insurance member ID number which occurred around July 30, 2023 (the “Security Incident”). After learning of the Security Incident, Defendant mailed notification to persons whose PII may have been impacted by the Security Incident. Subsequently, this Action was filed asserting claims against Defendant relating to the Security Incident.

Defendant denies any wrongdoing.

### 3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representatives, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, in the best interests for Settlement Class Members. The Court did not decide in favor of the Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at [www.SchillerSettlement.com](http://www.SchillerSettlement.com)

#### 4. Why is this a class action?

In a class action, one or more people called a “Class Representative” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.”

#### 5. How do I know if I am included in the Settlement?

You are included in the Settlement if Bell Flavors identified you as being among those individuals impacted by the Security Incident, including all who were sent a notice of the Security Incident. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit [www.SchillerSettlement.com](http://www.SchillerSettlement.com), call toll-free at 1-800-657-8185, or write to Settlement Administrator c/o Rust Consulting, Inc. – 8972 PO Box 2599 Faribault, MN 55021-9599

### THE SETTLEMENT BENEFITS

#### 6. What does this Settlement provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

##### **Expense Reimbursement**

**Documented Out-of-Pocket Losses:** Settlement Class Members are eligible to receive reimbursement for Documented Out-of-Pocket Losses, not to exceed \$4,500.00 per Settlement Class Member, including proven actual monetary losses, which may include: (i) bank fees, (ii) long distance phone charges, (iii) cell phone charges (only if charged by the minute), (iv) data charges (only if charged based on the amount of data used), (v) postage, or (vi) gasoline for local travel; and (b) fees for credit reports, credit monitoring, or other identity theft insurance products purchased between July 30, 2023 and the Claims Deadline which is **October 23, 2025**. To receive reimbursement for any of the above-referenced Documented Out-of-Pocket Loss expenses, Settlement Class Members must submit a valid and timely Claim Form, including necessary supporting documentation, to the Settlement Administrator.

**Lost Time Reimbursement:** Settlement Class Members are also eligible to receive reimbursement for up to five (5) hours of lost time spent dealing with the Security Incident calculated at the rate of \$20 per hour (for a total of \$100.00). Settlement Class Members may receive reimbursement for lost time if the Settlement Class Member provides a brief description of the activities engaged in, the time spent on each such activity, and an attestation on the Claim Form that the activities they performed were related to the Security Incident.

**Credit Monitoring:** Settlement Class Members will have the opportunity to enroll in two years of three-bureau credit monitoring services through LifeLock, which includes at least \$1,050,000 in identity theft insurance.

**Remedial Relief:** Defendant has made certain security changes in response to the Security Incident. Defendant will continue those security changes and will pay for those changes separate and apart from other settlement benefits.

## **7. How to submit a claim?**

All claims will be reviewed by the Settlement Administrator for completeness and plausibility. You must file a Claim Form to get money from the proposed Settlement. Claim Forms must be submitted online by **October 23, 2025** or postmarked no later than **October 23, 2025**. You can submit an online claim or download a Claim Form at [www.SchillerSettlement.com](http://www.SchillerSettlement.com), or you can call the Settlement Administrator toll-free at 1-800-657-8185 for a Claim Form.

## **8. What am I giving up as part of the Settlement?**

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue Bell Flavors, and each of its past or present predecessors, successors, assigns, parents, subsidiaries, divisions, departments, owners, and related or affiliated entities, as well as any and all of Defendant's and these entities' respective predecessors, successors, officers, directors, board members, employees, advisors, vendors, stockholders, partners, agents, attorneys, representatives, insurers, reinsurers, subrogees and assigns (collectively, the "Released Parties") regarding the claims in this case.

The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Parties, is available at [www.SchillerSettlement.com](http://www.SchillerSettlement.com).

The only way to keep the right to sue is to exclude yourself (*see* Question 10), otherwise you will be included in the Settlement Class, and, if the Settlement is approved, you give up the right to sue for the claims in this case.

## **9. Will the Class Representatives receive compensation?**

Yes. The Class Representatives will receive a service award of up to \$2,500 each, to compensate them for their services and efforts in bringing the Action. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

### **EXCLUDE YOURSELF**

## **10. How do I exclude myself from the Settlement?**

If you do not want to be included in the Settlement, you must send a timely written request for exclusion, stating your full name, address, and telephone number. Your request for exclusion must: (a) state the name of the Action, *Coleen Schiller, et al. v. Bell Flavors & Fragrances, Inc.*, Case No. 2024CH07447; (b) your full name and current mailing address; (c) contain your personal signature, or the signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf of; and (d) the words "Request for Exclusion" or a comparable statement that you do not wish to participate in the Settlement at the top of the communication.

Your written request for exclusion must be postmarked no later than September 23, 2025 to:

Settlement Administrator  
c/o Rust Consulting, Inc. - 8972  
PO Box 2599  
Faribault, MN 55021-9599

Instructions on how to submit a request for exclusion are available at [www.SchillerSettlement.com](http://www.SchillerSettlement.com) or from the Claims Administrator by calling 1-800-657-8185.

If you exclude yourself, you will not be able to receive any cash benefit or credit monitoring from the Settlement, and you cannot object to the Settlement at the Final Approval Hearing. You will not be legally bound by anything that happens in the Action, and you will keep your right to sue Defendant on your own for the claims that this Settlement resolves.

#### **11. If I do not exclude myself, can I sue later?**

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Parties (listed in Question 8) for the claims this Settlement resolves.

#### **12. What happens if I do nothing at all?**

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any money or credit monitoring services from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled claims in this case at any time.

### **THE LAWYERS REPRESENTING YOU**

#### **13. Do I have a lawyer in the case?**

Yes. The Court has appointed STRAUSS BORRELLI PLLC (called “Settlement Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

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

Settlement Class Counsel will apply to the Court for an award of combined attorneys’ fees, costs and expenses in an amount not to exceed \$140,000.00. A copy of Class Counsel’s Motion for Attorneys’ Fees, Costs, Expenses, and Service Award for Class Representative will be posted on the Settlement Website, [www.SchillerSettlement.com](http://www.SchillerSettlement.com), before the Final Approval Hearing. The Court will make the final decisions as to the amounts to be paid to Settlement Class Counsel, and may award less than the amount requested by Settlement Class Counsel.

## OBJECTING TO THE SETTLEMENT

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

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you must file an objection with the Court telling it why you do not think the Settlement should be approved.

Objections must be submitted in writing and include all the following information:

- a) the name of the Action, *Coleen Schiller, et al. v. Bell Flavors & Fragrances, Inc.* (Case No. 2024CH07447);
- b) your full name, current mailing address, and phone number;
- c) a statement that states with specificity your grounds for your objection, as well as any documents that support your objection;
- d) a statement as to whether your objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- e) the identity of any attorneys representing you;
- f) a statement regarding whether you or your attorney will to appear at the Final Approval Hearing;
- g) a list of all other lawsuits (if any) in which your attorney has submitted an objection to a class action settlement within the last three (3) years; and,
- h) your signature or your attorney's signature.

Your Objection must be postmarked no later than September 23, 2025 at:

Hon. Michael T. Mullen  
Courtroom 2510  
[Richard J. Daley Center](#)  
50 W. Washington St.  
Chicago, Illinois 60602

In addition, you must concurrently email or mail a copy of your objection to the Settlement Administrator, postmarked no later than September 23, 2025, to:

Settlement Administrator  
c/o Rust Consulting, Inc. - 8972  
PO Box 2599  
Faribault, MN 55021-9599

If you do not submit your objection with all the above requirements, or if your objection is not received by September 23, 2025 you will be considered to have waived all Objections and will not be entitled to speak at the Final Approval Hearing.

### 16. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you



don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

## **THE FINAL APPROVAL HEARING**

### **17. When and where will the Court decide whether to approve the Settlement?**

The Court will hold the Final Approval Hearing on October 15, 2025 1:30 p.m., at the Circuit Court of Cook County, located in Courtroom 2510 of the Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602. The hearing may be held remotely, or moved to a different date, time, or location without additional notice, so it is recommended that you periodically check [www.SchillerSettlement.com](http://www.SchillerSettlement.com) for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be finally approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of attorneys' fees, costs, and expenses to Settlement Class Counsel and the request for a Service Award to the Class Representatives.

### **18. Do I have to come to the hearing?**

No. You are not required to come to the Final Approval Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Approval Hearing, but that is not necessary. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

### **19. May I speak at the hearing?**

Yes. You can speak at the Final Approval Hearing, but you must ask the Court for permission. You cannot speak at the hearing if you exclude yourself from the Settlement.

## **DO NOTHING**

### **20. What happens if I do nothing?**

If you do nothing, you will not get any money from the Settlement, you will not be able to sue for the claims in this case, and you release the claims against Defendant and the Released Persons described in Question No. 8.

## **GET MORE INFORMATION**

### **21. How do I get more information about the Settlement?**

This is only a summary of the proposed Settlement. If you want additional information about this Action, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Settlement Class Counsel's Motion for Attorneys' Fees, Costs, Expenses, and Service Award for Class Representative, and more, please visit [www.SchillerSettlement.com](http://www.SchillerSettlement.com) or call 1-800-657-8185. You may also contact the Settlement Administrator at Settlement Administrator c/o Rust Consulting, Inc. – 8972 PO Box 2599 Faribault, MN 55021-9599.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT  
OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR  
DEFENDANT'S COUNSEL.**