

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Brown Integrated Logistics, Inc. Notified You of a Data Breach, You May Be Eligible for Benefits from a Class Action Settlement.

- A proposed Settlement has been reached in a class action lawsuit known as *Goins v. Brown Integrated Logistics, Inc.*, Case No. 25CV4659, (“Action”), filed in the Superior Court of DeKalb County, Georgia.
- This Action against Brown Integrated Logistics, Inc. (“Defendant”) is based on an unauthorized access to Defendant’s computer network that occurred on or around November 13-15, 2023, and about which Defendant notified affected individuals on or about September 23, 2024 (the “Data Breach”). The claims asserted are based on allegations that files accessed or acquired during the Data Breach contained personally identifiable information about certain individuals, including name, address, date of birth, Social Security number, taxpayer identification number, financial account information, medical information, and health insurance information. Defendant disagrees with Plaintiffs’ claims and denies any wrongdoing.
- Settlement Class Members can receive the following benefits from the Settlement: (1) two (2) years of free, triple-bureau Credit Monitoring Services and reimbursement for Attested Time (up to \$100), Out-of-Pocket Costs (up to \$750), and/or Financial Losses (up to \$4,000); or (2) an Alternate Cash Payment of \$75.
- You are included in this Settlement as a Settlement Class Member if you are an individual to whom Defendant mailed written notification that their Personal Information was compromised in the Data Breach.
- Your legal rights are affected regardless of whether you do or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT

Submit a Claim	You must submit a valid Claim Form to get money or benefits from this Settlement. Claim Forms must be submitted online by November 4, 2025 , or, if mailed, postmarked no later than November 4, 2025 .
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue and you will not get any money or benefits.
Exclude Yourself	Get out of the Settlement. Get no money. Keep your rights. 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. Your Request for Exclusion must be postmarked no later than October 6, 2025 .
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than October 6, 2025 .
Go to a Hearing	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. The Final Approval Hearing will be set by the Court approximately 30 days before the hearing and posted on the settlement website.

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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 you are an individual to whom Defendant mailed written notification on or about September 23, 2024, that their Personal Information was compromised in the Data Breach that occurred on or about November 13-15, 2023.

The Settlement Class excludes: (i) Defendant, its officers and directors; (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 Data Breach 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 case about?

This case is known as *Goins v. Brown Integrated Logistics, Inc.*, Case No. 25CV4659, and it is filed in the Superior Court of DeKalb County, Georgia (the “Action”). The person who sued is called the “Plaintiff” and the company he sued, Brown Integrated Logistics, is known as the “Defendant” in this case. Brown Integrated Logistics, Inc. will be called “Defendant” in this Notice.

Plaintiff filed a lawsuit against Defendant, individually, and on behalf of anyone whose personally identifiable information was potentially impacted because of the Data Breach.

This Action against Defendant is based on an unauthorized access to Defendant’s computer network that occurred on or around November 13-15, 2023, and about which Defendant notified affected individuals on or about September 23, 2024 (the “Data Breach”). The claims asserted are based on allegations that files accessed or acquired during the Data Breach contained personally identifiable information about certain individuals, including name, address, date of birth, Social Security Number, taxpayer identification number, financial account information, medical information, and health insurance information. Defendant disagrees with Plaintiffs’ claims and 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 Plaintiff/Class Representative, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, in the best interests of Settlement Class Members. The Court did not decide in favor of the Plaintiff or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at www.BrownDataBreachSettlement.com.

4. Why is this a class action?

In a class action, one or more people called a “Settlement Class Representative” sue on behalf of all people who have similar claims. All 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 a Settlement Class Member if you are an individual to whom Defendant mailed written notification on or about September 23, 2024, that their Personal Information was compromised in the Data Breach that occurred on or about November 13-15, 2023.

If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.BrownDataBreachSettlement.com, call toll free (833) 420-3960, or write to: Goins v. Brown Integrated Logistics, Inc. c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

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

Credit Monitoring Services: Two (2) years of credit monitoring services that provide monitoring of the credit report with the three major credit bureaus (Experian, Equifax, and Transunion), alerts about changes in information to the credit report, dark web scanning for personal information, and identify theft insurance, and access to assistance to help investigate and resolve any issues.

Reimbursement for “Attested Time”: Reimbursement of up to five (5) hours at a rate of \$20 per hour of time spent remediating issues related to the Data Breach, if at least one full hour was spent, upon submission of an attestation detailing how and why the time was spent.

Reimbursement for “Out-of-Pocket Costs”: Reimbursement of up to \$750 for documented costs or expenditures that a Settlement Class Member actually incurred because of the Data Breach between September 23, 2024, and the date of the Preliminary Approval Order, including out of pocket expenses incurred as a result of the Data Breach, fees for credit reports, credit monitoring, or other identity theft insurance products purchased as a result of the Data Breach.

Reimbursement for “Financial Losses”: Reimbursement of up to \$4,000 for proven monetary losses arising from financial fraud or identity theft, if: (1) the loss is an actual, documented, unreimbursed monetary loss arising from identity theft, fraud, or similar misuse; (2) the loss from identity theft, fraud, or misuse was more likely than not caused by the Data Breach; (3) the actual identity theft, misuse, or fraud loss is not already covered by one or more of the other reimbursement categories; (4) the claimant made reasonable efforts to avoid the loss or seek reimbursement for the loss, including, but not limited to, exhaustion of all available credit monitoring insurance and identity theft insurance; and (5) the actual misuse or fraud loss occurred between November 13, 2023, and the close of the Claims Period.

OR

Alternate Cash Payment: Instead of any claims for Credit Monitoring Services, Attested Time, Out-of-Pocket Costs, or Financial Losses, Defendant will provide compensation to Settlement Class Members for an Alternate Cash Payment of \$75, upon submission of a timely and valid Claim Form. If you select this benefit, you may not make a claim for the benefits above.

To receive any of the payments or benefits described above, Settlement Class Members must submit a valid and timely Claim Form, including necessary supporting documentation, to the Settlement Administrator by the Claims Deadline.

7. How to submit a Claim Form

All Claim Forms 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 **November 4, 2025**, or postmarked no later than **November 4, 2025**. You can download a Claim Form at www.BrownDataBreachSettlement.com or you can call the Settlement Administrator at **(833) 420-3960** 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 Defendant and each and every of its respective predecessors, successors, assigns, parents, subsidiaries, divisions, departments, owners, and related or affiliated entities of any nature whatsoever, whether direct or indirect, as well as any and all of Defendant's and these entities' respective predecessors, successors, assigns, officers, directors, employees, owners, members, advisors, vendors, stockholders, partners, agents, attorneys, representatives, insurers, reinsurers, subrogees, and assigns (collectively, the "Released Parties") for any claims that are based on, arise out of, or are related to the Data Breach or any of the facts alleged or claims asserted in the Action (including the Class Action Complaint and any amendment thereto), Defendant's information security policies and practices, or Defendant's maintenance or storage of Personal Information, regardless of whether such claims arise under federal, state and/or local law, statute, ordinance, regulation, common law, or any of other source of law (collectively, the "Released Claims").

The Settlement Agreement, which includes all provisions about settled claims, releases, and the Releasees, is available at www.BrownDataBreachSettlement.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 Settlement Class Representative receive compensation?

Yes. If approved by the Court, the Settlement Class Representative will receive a Service Award Payment of up to \$3,500, to compensate him for 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 Settlement Class Representative.

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 include the name of the proceeding, the individual's full name, current address, personal signature, and the words "Request for Exclusion" or a comparable statement that the individual does not wish to participate in the Settlement.

Your written Request for Exclusion must be postmarked no later than **October 6, 2025** to: Goins v. Brown Integrated Logistics, Inc. c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324

Instructions on how to submit a Request for Exclusion are available at www.BrownDataBreachSettlement.com or from the Settlement Administrator by calling **(833) 420-3960**.

If you exclude yourself, you will not be able to receive any cash benefit or reimbursement of documented Out-of-Pocket Expenses 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 Defendants 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 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 Parties (listed in Question 8) about the Released Claims at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. Raina C. Borrelli of Strauss Borrelli PLLC (called “Settlement Class Counsel”) 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 and Litigation Costs and Expenses, to be paid by Defendant in an amount not to exceed \$150,000. A copy of Settlement Class Counsel’s Motion for attorneys’ fees, costs, expenses, and Service Award Payment for the Settlement Class Representative will be posted on the Settlement Website, www.BrownDataBreachSettlement.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 proceedings;
- b) the Settlement Class Member's full name and current mailing address;
- c) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection;
- d) the identity of any attorneys representing the objector;
- e) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing;
- f) a list of all other lawsuits (if any) in which you and/or your attorney has submitted an objection to a class action settlement within the last three (3) years; and,
- g) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

Your Objection must be filed with the Clerk of Court and include the case name and docket number, *Goins et al. v. Brown Integrated Logistics, Inc.*, Case No. 25CV4659, in the Superior Court of DeKalb County, Georgia, to be received no later than **October 6, 2025** at:

Attn: Clerk of the Court
Superior Court of DeKalb County, Georgia
556 N. McDonough Street
Decatur, GA 30030

In addition, you must concurrently mail or hand deliver a copy of your objection to Settlement Administrator postmarked no later than **October 6, 2025**:

SETTLEMENT ADMINISTRATOR
Goins v. Brown Integrated Logistics, Inc. c/o Kroll Settlement Administration LLC, P.O. Box 5324 New York, NY 10150-5324

In addition, if the objecting Settlement Class Member intends to appear at the Final Approval Hearing, either with or without counsel, he or she must also file with the Court, and mail or hand-deliver to Settlement Class Counsel and Defendants' Counsel, a notice of appearance no later than forty-five (45) days after the Notice Deadline.

CLASS COUNSEL	Sheffield (DEFENSE) COUNSEL
Raina C. Borrelli Strauss Borrelli PLLC 980 N Michigan Avenue, Suite 1610 Chicago, Illinois 60611	Freeman Mathis & Gary, LLP c/o David A. Cole 100 Galleria Parkway, Suite 1600 Atlanta, GA 30339

If the objecting Settlement Class Member intends to appear at the Final Approval Hearing through counsel, the notice of appearance filed with the Court must also:

- Identify the attorney(s) representing the objector who will appear at the Final Approval Hearing;
- Include each such attorney's name, address, phone number, email address, state bar(s) to which counsel is admitted, as well as associated state bar numbers;
- Include a list identifying all objections each counsel has filed to class action settlements in the past three (3) years, the results of each objection, any court opinions ruling on the objections, and any sanctions issued by a court in connection with objections filed by such attorney, and;
- If the objecting Settlement Class Member intends to request permission from the Court to call witnesses at the Final Approval Hearing, the objecting Settlement Class Member must provide a list of any such witnesses together with a brief summary of each witness's expected testimony at least thirty (30) days before the Final Approval Hearing.

If you do not submit your Objection with all requirements, or if your Objection is not received by October 6, 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 Final Approval Hearing in the Superior Court of DeKalb County, Georgia, will be set by the Court approximately 30 days before the hearing and posted on the settlement website. The hearing may also be held virtually, or moved to a different date, time, or location without additional notice, so it is recommended that you periodically check **www.BrownDataBreachSettlement.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

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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 Payment to the Settlement Class Representative.

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. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required for you to make an appearance at the hearing. You cannot speak at the hearing if you exclude yourself from the Settlement.

GET MORE INFORMATION

20. How do I get more information about the Settlement or update my address?

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 Payment for the Settlement Class Representative, and/or need to update your contact information, please visit www.BrownDataBreachSettlement.com, or call (833) 420-3960. You may also contact the Settlement Administrator at: Goins v. Brown Integrated Logistics, Inc. c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

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