

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

*Hillbom v. R1 RCM, Inc. and Dignity Health dba Dignity Health - St. Rose Dominican Hospital,
Rosa de Lima Campus*

Case No. 2:24-cv-00664-JAD-EJY (D. Nev.)

A federal court authorized this Notice. This is not a solicitation from a lawyer, junk mail, or an advertisement. Please read this Notice carefully, as it may affect your legal rights.

If you were a patient of Dignity Health and you received notice of a Data Incident, you may be eligible for cash payment or other benefits from a class action settlement.

- A proposed Settlement has been reached in a class action lawsuit titled *Hillbom v. R1 RCM, Inc. and Dignity Health dba Dignity Health - St. Rose Dominican Hospital, Rosa de Lima Campus*, Case No. 2:24-cv-00664-JAD-EJY, filed in the United States District Court for the District of Nevada.
- This lawsuit arises out of Plaintiff's allegations that an unauthorized third party may have accessed the personal identifying information ("PII") and/or protected health information ("PHI") of certain current and former patients of Dignity Health, including Plaintiff and the Settlement Class Members (the "Data Incident").
- The Settlement Class includes all individuals whose PII and/or PHI was potentially impacted in the Data Incident and who were sent notice of the Data Incident by Defendants. If you received this Notice or the initial notice of the Data Incident from Defendants, then you are a Settlement Class Member.
- Under the Settlement, all Settlement Class Members can receive the following Settlement Benefits: (1) reimbursement for up to \$500 for documented Out-of-Pocket Expenses; (2) reimbursement for documented Extraordinary Losses up to \$2,500; (3) a Monetary Payment, the amount of which will depend on the participation rate in the Settlement and other factors; and (4) two (2) years of Medical Identity-Theft Monitoring and Protection Services.
- The Settlement Fund will also be used to pay for the costs of the settlement administration, court-approved attorneys' fees and expenses, and any Service Award for the Class Representative.
- 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
Form and Request
Benefits under the
Settlement**

This is the only way to get any of the benefits provided by this Settlement, including reimbursements for Out-of-Pocket Expenses or Extraordinary Losses, a Monetary Payment, or Medical Identity-Theft Monitoring and Protection Services.

Claim Forms must be submitted online by November 11, 2025, or, if

	mailed, postmarked no later than November 11, 2025.
Do Nothing	If you do nothing, you will remain in the Settlement Class, but you will not receive any of the Settlement Benefits. You will give up your rights to sue Defendants and the other Released Parties for the claims this Settlement resolves.
Exclude Yourself from the Settlement	<p>Opt out of the Settlement. Get no Settlement Benefits. Keep your rights.</p> <p>This is the only option that allows you to keep your right to sue Defendants for claims related to the Data Incident. You will not receive any of the Settlement Benefits.</p> <p>Your Request for Exclusion must be postmarked no later than October 13, 2025.</p>
File an Objection to the Settlement	<p>You may object to the Settlement by filing an objection with the Court explaining why you don't think the Settlement should be approved and mailing a copy of the objection to the addresses set forth below.</p> <p>You will remain in the Settlement Class and, if the Court approves the Settlement, you will give up the right to sue Defendants and the other Released Parties for the claims this Settlement resolves.</p> <p>If you file an objection, you may also submit a Claim Form to receive Settlement Benefits.</p> <p>Objections must be postmarked no later than October 13, 2025.</p>
Go to the Final Approval Hearing	<p>You may attend the Final Approval Hearing where the Court may hear arguments concerning the approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must file a request to do so or include such a request in your filed objection. You are <u>not</u> required to attend the Final Approval Hearing.</p> <p>The Final Approval Hearing is scheduled for November 14, 2025, at 10:00 a.m.</p>

BASIC INFORMATION

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

You are a Settlement Class Member, and your rights could potentially be affected by the Settlement, if you were mailed written notification by or on behalf of Defendants indicating an unauthorized third party may have accessed the PII and/or protected health information PHI of certain current and former patients of Dignity Health and that your PII and/or PHI may have potentially been impacted.

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

2. What is this lawsuit about?

This lawsuit arises out of an alleged Data Incident in which an unauthorized third party may have accessed the PII and/or PHI of certain current and former patients of Dignity Health. The PII and/or PHI potentially impacted in the Data Incident includes name, contact information, date of birth, Social Security number, location of services, clinical and/or diagnosis information, and patient account and/or medical record number. After the Data Incident, Defendants notified individuals whose PII and/or PHI were potentially impacted.

Plaintiff then filed this lawsuit against Defendants asserting claims relating to the Data Incident. Plaintiff seeks to represent a class of individuals whose PII and/or PHI was potentially impacted in the Data Incident. Defendants deny Plaintiff's claims and any wrongdoing in connection with the Data Incident.

The lawsuit is titled *Hillbom v. R1 RCM, Inc. and Dignity Health dba Dignity Health - St. Rose Dominican Hospital, Rosa de Lima Campus*, Case No. 2:24-cv-00664-JAD-EJY, and it is pending in the United States District Court for the District of Nevada. The person who sued is called the "Plaintiff," who is serving as Class Representative. The companies that Plaintiff sued, R1 RCM, Inc. ("R1") and Dignity Health d/b/a Dignity Health – St. Rose Dominican Hospital Rose De Lima Campus ("Dignity Health"), are known as the "Defendants" in this case.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. Class Representative, Defendants, and their respective attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class Members. The Court did not decide in favor of the Plaintiff or Defendants. Full details about the proposed Settlement are found in the Settlement Agreement available on the Settlement Website at **www.DignityHealthSettlement.com**. The Settlement Agreement defines certain capitalized words and phrases used in this Notice.

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 you were mailed written notification by Defendants indicating that your PII and/or PHI may potentially have been impacted in the Data 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.DignityHealthSettlement.com, call toll free (844) 496-0751, or write to:

R1/Dignity Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

6. What does this Settlement provide?

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

- **Medical Identity-Theft Monitoring and Protection Services.** Each Settlement Class Member will be eligible to receive an activation code for two (2) years of three-bureau credit monitoring and additional protection services offered through CyEx Medical Shield Total. In addition to providing credit monitoring, this service monitors medical and healthcare data to determine whether an individual's private health information is at risk or has been exposed to medical fraud. The expenses associated with procuring the Medical Identity-Theft Monitoring and Protection Services will be paid by the Settlement Administrator from the Net Settlement Fund.
- **Monetary Payment.** In addition to the Medical Identity-Theft Monitoring and Protection Services, each Settlement Class Member will be eligible to receive a Monetary Payment in the form of a check or digital payment from the Settlement Fund for the alleged damages they suffered as a result of having their PII and/or PHI potentially impacted in the Data Incident. The amount of the Monetary Payment will depend on the participation rate of the Settlement, and the amount will be each Settlement Class Member claimant's *pro rata* share of the Net Settlement Fund after all other Settlement Benefits have been paid, including payment for (1) all Claims for Medical Identity-Theft Monitoring and Protection Services, (2) Out-of-Pocket Expenses and Extraordinary Losses, and (3) the court-approved Fee Award and Costs for Class Counsel and any Service Award for the Class Representative. To receive a Monetary Payment, a Settlement Class Member must submit a valid and timely Claim Form to the Settlement Administrator.
- **Out-of-Pocket Expenses Payment.** In addition to the Medical Identity-Theft Monitoring and Protection Services and Monetary Payment, each Settlement Class Member may submit a Claim for up to \$500.00 for reimbursement of Out-of-Pocket Expenses. To receive an Out-of-Pocket Expenses payment, a Settlement Class Member must submit to the Settlement Administrator the following: (i) a valid and timely Claim Form electing to receive the Out-of-Pocket Expenses Settlement Benefit; (ii) an attestation regarding any actual and unreimbursed Out-of-Pocket Expenses; and (iii) Reasonable Documentation that demonstrates the Out-of-Pocket Expenses to be reimbursed.
- **Extraordinary Losses Payment.** In addition to the Medical Identity-Theft Monitoring and Protection Services, Monetary Payment, and Out-of-Pocket Expenses payment, each Settlement Class Member may submit a Claim for up to \$2,500.00 for reimbursement of Extraordinary Losses. To receive an Extraordinary Losses payment, a Settlement Class Member must submit to the Settlement Administrator the following: (i) a valid and timely

Claim Form electing to receive the Extraordinary Losses Settlement Payment; (ii) an attestation regarding any actual and unreimbursed Extraordinary Losses; and (iii) Reasonable Documentation that demonstrates the Extraordinary Losses to be reimbursed.

7. How do I submit a Claim?

You must submit a Claim Form to get any Settlement Benefits from the proposed Settlement. Claim Forms must be submitted online or postmarked no later than **November 11, 2025**. You can download a Claim Form from the Settlement Website at **www.DignityHealthSettlement.com** or you can call the Settlement Administrator at (844) 496-0751.

This Class is a closed class, and Settlement Benefits are only available to Class Members with a Notice ID. If you submit a Claim without Notice ID, your Claim may be denied.

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

If you stay in the Settlement Class, you will be eligible to receive Settlement Benefits, but you will not be able to sue Defendants and the other 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 the Settlement Website, **www.DignityHealthSettlement.com**.

The only way to keep the right to sue is to request to exclude yourself from the Settlement. Otherwise, you will be included in the Settlement Class, and if the Settlement is approved, you give up the right to sue for any claims related to the Data Incident.

9. Will the Class Representative receive compensation?

Yes. The Class Representative will request a Service Award of up to \$2,500 to compensate her for her services and efforts in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the 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. Your Request for Exclusion must be individually signed by you. Your request must clearly express your intent to be excluded from the Settlement.

Your written Request for Exclusion must be postmarked no later than **October 13, 2025**, to:

R1/Dignity Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

If you exclude yourself, you will not be able to receive any money or other Settlement Benefits, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit, and you will keep your right to sue the 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 Defendants and the other Released Parties 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 other Settlement Benefits, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit, against Defendants or the other Released Parties about the settled claims in this lawsuit at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Abbas Kazerounian, Mona Amini, and Gustavo Ponce, of Kazerouni Law Group, APC as 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?

Class Counsel will apply to the Court for an award of combined attorneys' fees, costs, and litigation expenses. A copy of Class Counsel's Motion for Fee Award and Costs will be posted on the Settlement Website, www.DignityHealthSettlement.com, before the Final Approval Hearing. The Court will make the final decision as to the amount to be paid to Class Counsel and may award less than the amount requested by 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 can submit an objection telling the Court why you do not think the Settlement should be approved.

If you do not submit your objection that meets all requirements, or if your objection is not filed or postmarked by **October 13, 2025**, you will be considered to have waived all objections and will not be entitled to speak at the Final Approval Hearing.

Your objection must be postmarked no later than **October 13, 2025**, to:

R1/Dignity Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

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 do

not 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 **November 14, 2025, at 10:00 a.m.** in Courtroom 6D of the Lloyd D. George United States Courthouse, at 333 Las Vegas Blvd South, Las Vegas, Nevada, 89101. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check the Settlement Website, www.DignityHealthSettlement.com, for updated information.

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

19. May I speak at the hearing?

Yes. You can request to speak at the Final Approval Hearing, but you must submit notice and ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in the Settlement Agreement, which includes submitting all the information required. You cannot object or 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 receive any money or Settlement Benefits from the Settlement, and you will not be able to sue Defendants or any other Released Parties for claims related to the Data Incident.

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 lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Motion for Fee Award and Costs, and more, please visit the Settlement Website, www.DignityHealthSettlement.com, or call (844) 496-0751. You may also contact the Settlement Administrator at:

R1/Dignity Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.nvd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Nevada at 333 Las Vegas Blvd. South, Las Vegas, NV 89101 between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

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