

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Phillips v. Dobson Technologies Inc.*

Case No. CJ-2024-5401

District Court for Oklahoma County, Oklahoma

**IF YOU WERE IMPACTED BY THE NOVEMBER 2022 - MARCH 2023  
DOBSON TECHNOLOGIES DATA SECURITY INCIDENT  
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,  
AND ENTITLE YOU TO BENEFITS, INCLUDING A CASH PAYMENT.**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with Dobson Technologies Inc (“Dobson” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on Dobson's computer systems that occurred on or about November 19, 2022 – March 3, 2023 (the “Data Security Incident”). Certain files that contained private information may have been accessed. These files may have contained personal information such as full names; driver’s license or state identification numbers; financial account information; credit card numbers; taxpayer ID information; passport numbers; Social Security Numbers; health insurance information; medical information; and dates of birth.
- The lawsuit is called *Phillips v. Dobson Technologies Inc.*, Case No. CJ-2024-5401. It is pending in the District Court for Oklahoma County, Oklahoma (the “Litigation”).
- Dobson denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the litigation.
- Dobson's records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Dobson.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

| SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | DEADLINE                |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>SUBMIT A CLAIM</b>                                       | <p>The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.DobsonTechSettlement.com">www.DobsonTechSettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p> | <b>December 4, 2025</b> |
| <b>OPT OUT OF THE SETTLEMENT</b>                            | You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.                                                                                                                                                                                                    | <b>November 4, 2025</b> |
| <b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>     | If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.                                                                                                                                                                               | <b>November 4, 2025</b> |
| <b>DO NOTHING</b>                                           | Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.                                                                                                                                                        | No Deadline             |

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

## WHAT THIS NOTICE CONTAINS

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## Basic Information

### 1. Why was this Notice issued?

The District Court for Oklahoma County, Oklahoma, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Phillips v. Dobson Technologies Inc.*, Case No. CJ-2024-5401 (the “Action”). It is pending in the District Court for Oklahoma County, Oklahoma. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, Dobson Technologies Inc, is called the “Defendant.”

### 2. What is this lawsuit about?

Plaintiff alleges that during the November 19, 2022 – March 3, 2023, targeted cyberattack on Dobson's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as full names; driver's license or state identification numbers; financial account information; credit card numbers; taxpayer ID information; passport numbers; Social Security Numbers; health insurance information; medical information; and dates of birth. Defendant denies all claims asserted against it in the Action and denies all allegations of wrongdoing and liability.

### 3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representative is Jeffrey Phillips, and everyone included in this Action are the Class Members.

### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the

Settlement. The Plaintiff, Defendant, and their attorneys think the Settlement is fair, reasonable, adequate, and in the best interest for all Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class as: “All individuals residing in the United States whose Personal Information was or may have been compromised in the Data Security Incident experienced by Dobson which began on or around November 19, 2022, including all those who received notice of the Data Security Incident.”

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are: (i) Defendant (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 Security Incident or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@DobsonTechSettlement.com](mailto:info@DobsonTechSettlement.com)
- Call toll free, 24/7: 1-844-496-1032
- By mail: Dobson Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799

You may also view the Settlement Agreement at [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

Dobson has agreed to pay for a number of different benefits. All Class Members can enroll in one year of **Credit Monitoring Services** from the three credit agencies. In addition to Credit Monitoring Services, Class Members may choose between **two cash payment options**:

**OPTION 1:** Select one or more of the following benefits:

- Out-of-Pocket Expenses
- Reimbursement for Lost Time

OR

**OPTION 2:** Alternative Cash Payment.

- Receive a one-time \$50.00 cash payment

There is an aggregate cap of \$450,000.00 on these benefits. This means that if the total value of benefits claimed is over \$450,000.00, everyone’s payments will be reduced pro rata so that they add up to \$450,000.00. This is not expected to happen, but it might.

More information about each of these benefits is below. Full details are in Section II of the Settlement Agreement, available at [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com).

## **CREDIT MONITORING SERVICES**

All Class Members can enroll in one year of Credit Monitoring Services from the three credit bureaus. This benefit includes \$1 million of identity theft protection insurance.

## **CASH PAYMENT OPTION 1**

**Out-of-Pocket Expenses.** If you incurred actual, documented out-of-pocket expenses due to the Data Security Incident, you can get back up to **\$2,000.00**. The losses must have occurred between November 19, 2022, and December 4, 2025.

This benefit covers out-of-pocket expenses like:

- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail
- losses from identity theft or fraud

You need to send proof, like receipts or bank statements, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim.

**Reimbursement for Lost Time.** Class Members who spent time responding to the Data Security Incident may claim up to four (4) hours, at \$20.00 per hour, for a maximum of **\$80.00**. This benefit counts toward the \$2,000.00 cap for **Out-of-Pocket Expenses**.

You must have spent the time on tasks related to the Data Security Incident. Some examples include things like changing your passwords, investigating suspicious activity in your accounts, and researching the Data Security Incident.

You must provide a brief description and attest that you spent the time claimed on tasks related to the Data Security Incident.

## **CASH PAYMENT OPTION 2**

**Alternative Cash Payment.** Instead of the benefits in Cash Payment Option 1, you may claim a one-time **\$50.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

Claims will be subject to review for completeness and validity by the Settlement Administrator.

If a Class Member does not submit a valid and timely Claim Form, the Class Member will release his or her claims without receiving any of the above Settlement benefits.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@DobsonTechSettlement.com](mailto:info@DobsonTechSettlement.com)
- Call toll free, 24/7: 1-844-496-1032
- By mail: Dobson Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799

## 8. What claims am I releasing if I stay in the Class?

If you stay in the class, you won't be able to be part of any other lawsuit against Dobson or the Release Party about the issues that this Settlement covers. The "Release" section of the Settlement Agreement (Section IX) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com).

## Submitting a Claim Form for a Settlement Payment

## 9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

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

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-844-496-1032, by email [info@DobsonTechSettlement.com](mailto:info@DobsonTechSettlement.com), or by U.S. mail at the address above.

## 10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by December 4, 2025. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than December 4, 2025.

## 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on January 19, 2026 (**see Question 18**). If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

## The Lawyers Representing You

## 12. Do I have a lawyer in the case?

Yes, the Court appointed attorney Raina C. Borrelli of Strauss Borrelli PLLC, to represent you and other Class Members ("Class Counsel").

## 13. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

## 14. How will Class Counsel be paid?

Class Counsel will ask the court to approve \$155,000.00, in attorneys' fees, costs, and expenses which will be paid by Dobson.

Class Counsel will also ask for a Service Award Payment of \$2,500.00 for the Class Representative. The Service Award Payment will also be paid by Dobson. A copy of the application will be posted on at [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com), after it is filed. The Court will make the final decision as to the amounts to be paid to Class Counsel and may award less than the amount requested by Class Counsel.

## **Excluding Yourself from the Settlement**

### **15. How do I opt out of the Settlement?**

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue Dobson on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **November 4, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Action: *Phillips v. Dobson Technologies Inc.*, Case No. CJ-2024-5401, pending in the District Court for Oklahoma County, Oklahoma;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Dobson Data Security Incident Settlement  
ATTN: Exclusion Request  
P.O. Box 25226  
Santa Ana, CA 92799

Your Request for Exclusion must be submitted, postmarked, or emailed by **November 4, 2025**.

## **Commenting on or Objecting to the Settlement**

### **16. How do I tell the Court if I like or do not like the Settlement?**

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Action: *Phillips v. Dobson Technologies Inc.*, Case No. CJ-2024-5401, pending in the District Court for Oklahoma County, Oklahoma;
- (2) your full name, mailing address, telephone number, and email address;
- (3) information that proves that you are a Class Member (such as a notice you have received);
- (4) a clear description of all the reasons you object; include any legal support you may have for your objection;
- (5) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;
- (6) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (7) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **November 4, 2025**. You must also send a copy of the objection to the Settlement Administrator.

| Clerk of the Court                                                                                                           | Settlement Administrator                                                                              |
|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Clerk of the Court<br>Bonner, Anthony L.<br>Oklahoma County Courthouse<br>321 Park Ave., Room 304<br>Oklahoma City, OK 73102 | Dobson Data Security Incident Settlement<br>ATTN: Objections<br>P.O. Box 25226<br>Santa Ana, CA 92799 |

## 17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## The Court's Final Approval Hearing

### 18. When is the Court's Final Approval Hearing?

The Court will hold a final approval on **January 19, 2026 at 9:00 a.m. Central Time**, in Room 304 of the District Court for Oklahoma County, Oklahoma, at the Oklahoma County Courthouse, 321 Park Ave. Oklahoma City, OK 73102.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award Service Award Payment to the Class Representative. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com) for updates.

### 19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### 20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## Getting More Information

### 21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.DobsonTechSettlement.com](http://www.DobsonTechSettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@DobsonTechSettlement.com](mailto:info@DobsonTechSettlement.com)
- Call toll free, 24/7: 1-844-496-1032
- By mail: Dobson Data Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court Oklahoma County Courthouse, 321 Park Ave., Room 304, Oklahoma City, OK 73102.

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**