

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Hakkila et al. v. Neuromusculoskeletal Center Of The Cascades, PC

Case No. 25CV4659

Circuit Court of Deschutes County, Oregon

**IF YOUR PERSONAL INFORMATION WAS COMPROMISED IN THE
OCTOBER 2023 NEUROMUSCULOSKELETAL CENTER OF THE CASCADES
AND CASCADE SURGICENTER DATA INCIDENT
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO BENEFITS AND 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 Neuromusculoskeletal Center of the Cascades, PC, and Cascade Surgicenter, LLC (“Cascade” or “Defendants”) in a class action lawsuit. This case is about the targeted cyberattack on Cascade's computer systems that occurred in October 2023 (the “Data Incident”). Certain files that contained personal information were accessed. These files may have contained personal information such as full names; addresses; phone numbers; email addresses; dates of birth; Social Security numbers; driver’s license numbers; state ID numbers; financial account and routing numbers; financial institution names; credit card information; debit card information; medical treatments; medical diagnoses; prescription information; provider names; medical record numbers; Medicare ID numbers; Medicaid ID numbers; health insurance information; treatment costs; and digital signatures.
- The lawsuit is called *Hakkila et al. v. Neuromusculoskeletal Center Of The Cascades, PC*, Case No. 25CV4659. It is pending in the Circuit Court of Deschutes County, Oregon (the “Litigation”).
- Cascade contests the allegations made in the Litigation and denies that it did anything wrong. 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.
- Cascade's records indicate that you are a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Cascade.
- 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
SUBMIT A CLAIM	<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 www.CascadeSurgiCenterSettlement.com. 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>	December 26, 2025
OPT OUT OF THE SETTLEMENT	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 Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	November 25, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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.	November 25, 2025
DO NOTHING	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 Defendants 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.

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Basic Information

1. Why was this Notice issued?

The Circuit Court of Deschutes County, Oregon, 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 *Hakkila et al. v. Neuromusculoskeletal Center Of The Cascades, PC*, Case No. 25CV4659. It is pending in the Circuit Court of Deschutes County, Oregon. The people that filed this lawsuit are called the “Plaintiffs” (or “Settlement Class Representatives”) and the companies they sued, Neuromusculoskeletal Center of the Cascades, PC, and Cascade Surgicenter, LLC, are called the “Defendants.”

2. What is this lawsuit about?

This lawsuit alleges that during the October 2023, targeted cyberattack on Cascade's computer systems, certain files that contained personal information were accessed. These files may have contained personal information such as full names; addresses; phone numbers; email addresses; dates of birth; Social Security numbers; driver’s license numbers; state ID numbers; financial account and routing numbers; financial institution names; credit card information; debit card information; medical treatments; medical diagnoses; prescription information; provider names; medical record numbers; Medicare ID numbers; Medicaid ID numbers; health insurance information; treatment costs; and digital signatures. Defendants deny any wrongdoing whatsoever and deny that they have any liability to Plaintiffs or the Class.

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 “Settlement Class Representatives.” Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Settlement Class Representatives are Krysta Hakkila and Ida Vetter. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendants are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Settlement Class this way: “All individuals to whom Defendants mailed written notification that their personal information was compromised in the Data Incident that occurred on or around October 2, 2023.”

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) the Judge in this case, and the Judge’s family and staff; (2) Cascade and its officers and directors; (3) anyone who validly excludes themselves from the Settlement; and (4) anyone who perpetrated the Data Incident.

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

- Email: info@CascadeSurgiCenterSettlement.com
- Call toll free, 24/7: (844) 496-1162
- By mail: Cascade Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also view the Settlement Agreement at www.CascadeSurgiCenterSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Cascade has agreed to pay for a number of different benefits. You have two options:

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

- Medical Data Monitoring Services
- Payment for Out-of-Pocket Expenses
- Payment for Losses from Identity Theft or Fraud
- Payment for Lost Time

OR

OPTION 2: Alternative Cash Payment.

- Receive a one-time \$80.00 cash payment

The benefits are explained in more detail below.

Medical Data Monitoring Services. All Class Members are eligible to enroll in two years of **CyEx Medical Shield Total**. This comprehensive service comes with \$1 million of medical identity theft insurance, and includes monitoring for:

- Healthcare insurance ID exposure
- Medical Record Number (MRN) exposure
- Unauthorized Health Savings Account (HSA) spending

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

Out-of-Pocket Expenses. If you incurred actual, documented out-of-pocket expenses due to the Data Incident, you can get back up to **\$500.00**. The losses must have occurred between October 2, 2023, and December 26, 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

You need to send proof, like receipts, 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.

Losses for Identity Theft or Fraud. If you lost money because of identity theft or fraud, you can get back up to **\$2,500.00**.

You will need to show that:

- The theft or fraud was probably caused by the Data Incident
- The losses are not already covered by **Out-of-Pocket Expenses**
- You tried to prevent the loss or get your money back, such as by using insurance you already have

The losses must have occurred between October 2, 2023, and December 26, 2025.

You need to send proof, like receipts, 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.

Cash Payment for Lost Time. Class Members who spent time responding to the Data Incident may claim up to four hours, at \$25.00 per hour, for a maximum of **\$100.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- Changing your passwords
- Investigating suspicious activity in your accounts
- Researching the Data Incident

You must briefly describe how you spent this time.

Alternative Cash Payment. Instead of *any other* benefits, you may claim a one-time **\$80.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

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

- Email: info@CascadeSurgiCenterSettlement.com
- Call toll free, 24/7: (844) 496-1162
- By mail: Cascade Data 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 Cascade about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Paragraphs 64 – 66) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.CascadeSurgiCenterSettlement.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.CascadeSurgiCenterSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Cascade Data 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, (844) 496-1162, by email info@CascadeSurgiCenterSettlement.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 26, 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 26, 2025.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on January 9, 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 has appointed attorneys Raina C. Borrelli of Strauss Borrelli PLLC and John Nelson of Milberg to represent you and other Settlement Class Members (“Settlement Class Counsel”).

13. Should I get my own lawyer?

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

14. How will Class Counsel be paid?

Settlement Class Counsel will ask the court to approve \$265,000.00 as reasonable attorneys’ fees and costs of litigation. This amount will be paid by Cascade.

Settlement Class Counsel will also ask for Service Award Payments of \$5,000.00 for each of the Settlement Class Representatives. Service Award Payments will also be paid by Cascade.

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 Cascade 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 25, 2025.

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

- (1) The name of the Litigation: *Hakkila et al. v. Neuromusculoskeletal Center Of The Cascades, PC*, Case No. 25CV4659, pending in the Circuit Court of Deschutes County, Oregon;
- (2) Your full name and mailing address, ;
- (3) Your 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:

Cascade Data 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 25, 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 Settlement 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 Litigation: *Hakkila et al. v. Neuromusculoskeletal Center Of The Cascades, PC*, Case No. 25CV4659, pending in the Circuit Court of Deschutes County, Oregon;
- (2) Your full name and current mailing address;
- (3) A clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (4) If you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;
- (5) A statement on whether you and/or your lawyer will be attending the Final Approval Hearing;
- (6) If you or your lawyer have objected in any other cases in the past three years, list the names, courts, and civil action numbers for each of those cases;
- (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 25, 2025. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 1100 NW Bond Street Bend, Oregon 97703	Cascade Data Incident Settlement ATTN: Objections P.O. Box 25226 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 9, 2026 at 9:45 a.m. Pacific Time**, via video. For information on how to join the hearing, please visit the FAQs on the settlement website.

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

If you are a Settlement 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.CascadeSurgiCenterSettlement.com for updates.

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

No. Settlement 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.CascadeSurgiCenterSettlement.com.

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

- Email: info@CascadeSurgiCenterSettlement.com
- Call toll free, 24/7: (844) 496-1162
- By mail: Cascade Data 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, 1100 NW Bond Street Bend, Oregon 97703.

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

