

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Jacob Cygan Gilmore, et al. v. St. Joseph's College of Maine
State of Maine, Cumberland County Superior Court
Docket No: CUMSC-CV-2025-107

**IF YOUR PRIVATE INFORMATION WAS POTENTIALLY
IMPACTED BY A CYBERSECURITY INCIDENT REPORTED BY
ST. JOSEPH'S COLLEGE OF MAINE IN MARCH 2025, YOU MAY
BE ELIGIBLE TO RECEIVE BENEFITS FROM A PROPOSED
CLASS ACTION SETTLEMENT.**

*A state court authorized this Notice.
You are not being sued.
This is not a solicitation from a lawyer.*

- A Settlement has been reached with St. Joseph's College of Maine ("Defendant") in a class action lawsuit about a cybersecurity incident reported by St. Joseph's College of Maine in March 2025 ("Security Incident").
- The lawsuit *Jacob Cygan Gilmore, et al. v. St. Joseph's College of Maine*, Docket No. CUMSC-CV-2025-107, was filed in the State of Maine, Cumberland County Superior Court ("the "Action"). St. Joseph's College of Maine denies the allegations and all liability with respect to any and all facts and claims alleged in the Action but has agreed to the proposed settlement to avoid the uncertain outcome and risk of continuing this case.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is an individual or a respective successor or assign thereof, who resides in the United States and whose identifying information or information that when used in combination with other information can be used to identify, locate, or contact an individual ("Private Information") was impacted by the Security Incident.
- As a Settlement Class Member, your rights are affected whether you act or don't act. These rights and options and the deadlines to exercise them are explained in this Notice. Please read this Notice carefully.
- The Court overseeing this case still has to decide whether to approve the Settlement.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM	Complete and submit your Claim Form online at www.StJosephsDataSettlement.com or download the Claim Form from the Settlement Website and mail the completed form to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form. The only way to receive benefits from this Settlement.	December 29, 2025
REQUEST EXCLUSION ("OPT OUT" OF THE SETTLEMENT)	Opt Out of the Settlement and retain your right 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 elect to retain your own legal counsel at your own expense. If you Opt Out, you will not be eligible to receive benefits from this Settlement.	November 28, 2025
FILE AN OBJECTION AND/OR ATTEND A HEARING	Write 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 benefits.	November 28, 2025
DO NOTHING	Unless you request exclusion, you are part of the Settlement. If you do nothing, you will not receive benefits 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

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BASIC INFORMATION

1. Why was this Notice issued?

A state court authorized this Notice because 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 captioned *Jacob Cygan Gilmore, et al. v. St. Joseph's College of Maine*, Docket No: CUMSC-CV-2025-107, State of Maine, Cumberland County Superior Court. The individuals that filed this Lawsuit are called the "Plaintiffs" and the company they sued is called the "Defendant."

2. What is this Lawsuit about?

This Lawsuit alleges that Private Information held by St. Joseph's College of Maine was impacted by a cybersecurity incident that Defendant reported in March 2025 ("Security Incident").

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 who sue are known as "Class Representatives" or "Plaintiffs." Together, the people included in the class action are called the "Settlement Class" or "Settlement Class Members." One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, "opting out") from a settlement. In this Settlement, the Class Representatives or Plaintiffs are Jacob Cygan Gilmore, Jennifer Dyer, Joseph Earnhardt, Brynne Lander and Monika Lavigne.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. The Defendant denies the allegations and all liability with respect to the facts and claims made in the Action. Plaintiffs and the Defendant agreed to a settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim benefits. The Plaintiffs and their attorneys, who also represent the Settlement Class Members, think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals, or their respective successors or assigns, who reside in the United States and whose Private Information was impacted by the Security Incident Defendant reported in March 2025.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) St. Joseph's College of Maine, 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 Security Incident or who pleads *nolo contendere* to any such charge.

If you are not sure if you are a Settlement Class Member, you may contact the Settlement Administrator for assistance by email at StJosephsDataSettlement@atticusadmin.com or call toll-free 1-800-313-5540.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Under the Settlement, St. Joseph's College of Maine will pay all valid and timely claims for Credit Monitoring, Unreimbursed Losses, and Lost Time related to the Security Incident.

8. How much will my payment be?

Settlement benefits will vary according to Settlement Class Member experiences related to the Security Incident and their individual preferences. Settlement Class Members may submit valid and timely Claim Forms for: (1) two years of credit monitoring services; (2) Unreimbursed Losses – up to \$2,000.00 per claimant; and (3) Lost Time at \$25.00 per hour for up to four hours.

Credit Monitoring Services. Settlement Class Members have the opportunity to make a claim for two years of Credit Monitoring Services to include credit monitoring through one national credit reporting bureau.

Compensation for Unreimbursed Losses up to a total of \$2,000.00 per claimant, upon submission of a valid claim with supporting documentation if (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Security Incident; and (iii) the loss occurred between December 15, 2023 and December 29, 2025. Unreimbursed losses include, without limitation, and by way of example, unreimbursed losses relating to fraud or identity theft; professional fees including attorneys' fees, accountants' fees, and fees for credit repair services; costs associated with freezing or unfreezing credit with any credit reporting agency; credit monitoring costs that were incurred on or after mailing of the notice of data breach, through the date of claim submission; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

Compensation for Lost Time at \$25.00 per hour, for up to four hours, for time spent monitoring accounts or otherwise dealing with issues related to the Security Incident, with an attestation on the Claim Form that the activities performed were related to the Security Incident. Compensation for Lost Time is subject to the \$2,000.00 cap for Unreimbursed Losses.

9. What claims am I releasing by staying in the Settlement Class?

Unless you Opt Out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The "Releases" Section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available for review at www.StJosephsDataSettlement.com.

HOW TO GET A PAYMENT - MAKING A CLAIM

10. How do I submit a claim and get a cash payment?

Claim Forms may be submitted online at www.StJosephsDataSettlement.com or downloaded and printed from the website and mailed or emailed to the Settlement Administrator at:

St. Joseph's Data Settlement
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164
StJosephsDataSettlement@atticusadmin.com

To have a Claim Form mailed to you, please call the Settlement Administrator at 1-800-313-5540.

11. What is the deadline for submitting a claim?

Claim Forms must be submitted online or postmarked for mail by **December 29, 2025**.

12. When will I get my payment?

The short answer is – after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on March 20, 2026, at 1 p.m. EST, to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award Service Award Payments to the Class Representative who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Payments will be distributed as soon as possible but cannot be paid until the Court grants final Settlement approval and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes, the Court appointed Peter L. Murray of Murray, Plumb & Murray and Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman, PLLC to represent you and other members of the Settlement Class (“Settlement Class Counsel”). You will not be charged directly for these lawyers; instead, they will receive compensation from Defendant, subject to Court approval.

If you want to be represented by your own lawyer, you may hire one at your own expense.

14. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Settlement Class Counsel will file a motion for an award of attorneys’ fees and Litigation Costs and Expenses to be paid by St. Joseph’s College of Maine. Defendant agrees not to oppose Settlement Class Counsel’s request for an award of attorneys’ fees, Litigation Costs and Expenses not to exceed Two Hundred Twenty Five Thousand Dollars (\$225,000.00). If Settlement Class Counsel seek more than \$225,000.00 in attorneys’ fees, Litigation Costs and Expenses, St. Joseph’s College of Maine reserves all rights to object and oppose such requests.

Settlement Class Counsel will also seek a Service Award Payment for the Class Representatives in recognition for their contributions to this Action. St. Joseph’s College of Maine agrees not to oppose Settlement Class Counsel’s request for service awards not to exceed One Thousand Five Hundred (\$1,500.00) for each of the Class Representatives. To the extent more than \$1,500.00 in service awards is sought for each of the Class Representatives, St. Joseph’s College of Maine reserves all rights to object and oppose such a request.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I Opt Out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must submit a Request for Exclusion from the Settlement Class. This is called “opting out” of the Settlement Class. The deadline for requesting exclusion from the Settlement is **November 28, 2025**.

To exclude yourself, a written Request for Exclusion must be sent to the Settlement Administrator, postmarked for mail, no later than **November 28, 2025**. A valid Request for Exclusion will include the following:

- the words “Request for Exclusion” or a comparable statement that the individual does not wish to participate in the Settlement at the top of the communication,
- your full name,
- current address,
- personal signature, and
- the case name: *Jacob Cygan Gilmore, et al. v. St. Joseph’s College of Maine*, Docket No: CUMSC-CV-2025-107, State of Maine, Cumberland County Superior Court.

Your Request for Exclusion must be postmarked no later than **November 28, 2025**, and sent to the Settlement Administrator at:

St. Joseph’s Data Settlement
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

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 benefits from the Settlement and should not submit a Claim Form. You may only exclude yourself – not any other person.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class Member, you may file a written objection no later than **November 28, 2025**, to inform the Court that you do not like the Settlement or some aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include: (i) the name of the proceedings; (ii) your full name, current mailing address, and telephone number; (iii) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection; (iv) a statement as to whether the objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class; (v) the identity of any attorneys representing the you; (vi) a statement regarding whether you or your attorney intend to appear at the Final Approval Hearing; (vii) a list of all other matters in which you and/or your attorney has lodged an objection to a class action settlement; and (viii) your signature or the signature of your attorney.

Any Settlement Class Member who does not file a timely and adequate objection in accordance with the above paragraph, waives the right to object to the Settlement at the Final Approval Hearing and shall be bound by the terms of the Settlement Agreement and by all orders and judgments in the Action.

Objections must be filed with the Court no later than **November 28, 2025**, at the following address:

Clerk of the Court
205 Newbury St
Portland, ME 04101

18. 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 means telling the Court 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

19. When is the Court's Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on March 20, 2026, at 1 p.m. EST, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a Service Award Payment to each Class Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost. If you do not like the Settlement, you may object to it, but you have to follow certain requirements (*see* Question 17). The date and time of this hearing may change without further notice. Please check www.StJosephsDataSettlement.com for updates.

20. 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. If you file an objection, you may but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider an objection that was filed on time and meets the requirements above.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to sue, continue to sue, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the releases of the Released Parties in the Settlement and not be eligible for Settlement benefits.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.StJosephsDataSettlement.com. If you have additional questions, you may contact the Settlement Administrator:

St. Joseph's Data Settlement
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164
StJosephsDataSettlement@atticusadmin.com
1-800-313-5540

You may also contact your counsel in this matter, the Settlement Class Counsel, as follows:

Peter L. Murray
MURRAY, PLUMB & MURRAY
75 Pearl Street, P.O. Box 9785
Portland, ME 04104-5085
pmurray@mpmlaw.com

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Chicago, IL 60606
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PLEASE DO NOT CONTACT THE COURT OR ST. JOSEPH'S COLLEGE OF MAINE