

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Jackson, et al. v. Prentke Romich Company d/b/a PRC-Salttillo

Case No. 24-cv-01708

United States District Court for the Northern District of Ohio

**IF YOU OR YOUR CHILD WERE IMPACTED BY THE AUGUST 2024
PRC-SALTILLO DATA INCIDENT,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO 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 of Settlement carefully and completely.

- A Settlement has been reached with the Prentke Romich Company d/b/a PRC-Salttillo (“PRC” or “Defendant”), in a class action lawsuit. This class action lawsuit is about the targeted cyberattack on PRC’s computer systems that occurred in August 2024 (the “Data Incident”). Certain files containing sensitive information were accessed. This sensitive information may have included names, addresses, phone numbers, dates of birth, treatment cost information, referring or treating physicians, health insurance policy numbers, Medicare/Medicaid plan names, medical devices purchased, and certain employee’s Social Security numbers.
- The lawsuit is captioned *Christina Jackson, on behalf of her minor child, J.L., and Cindy Westman, on behalf of her minor child Z.R., and on behalf of all others similarly situated v. Prentke Romich Company d/b/a PRC-Salttillo*, Case No. 24-cv-01708 , pending in the United States District Court for the Northern District of Ohio (the “Action”).
- PRC 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, risks, disruptions, and uncertainties of continuing the Litigation.
- PRC’s records indicate that you or your minor child are Settlement Class Members and are entitled to benefits under the Settlement. You may have received a previous notice of the Data Incident directly from PRC.

- Your rights are affected whether you act or don't act. ***Please read this Notice of Settlement carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.PRCSettlement.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 or if you lost or did not receive a Notice ID.	December 31, 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 Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	December 1, 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.	December 1, 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 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 of Settlement.
- 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 of Settlement issued?

The United States District Court for the Northern District of Ohio authorized this Notice of Settlement. 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 of Settlement explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is captioned *Christina Jackson, on behalf of her minor child, J.L., and Cindy Westman, on behalf of her minor child Z.R., and on behalf of all others similarly situated v. Prentke Romich Company d/b/a PRC-Salttillo*, Case No. 24-cv-01708 , pending in the United States District Court for the Northern District of Ohio. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the entity they sued, PRC, is called the “Defendant.”

2. What is this lawsuit about?

This class action lawsuit is about the targeted cyberattack on PRC's computer systems that occurred in August 2024 (the “Data Incident”). Certain files containing sensitive information were accessed. This sensitive information may have included names, addresses, phone numbers, dates of birth, treatment cost information, referring or treating physicians, health insurance policy numbers, Medicare/Medicaid plan names, medical devices purchased, and certain employee’s Social Security Numbers.

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 Representatives are Christina Jackson and Cindy Westman, and everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant is 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. Plaintiffs and their attorneys think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Settlement Class is defined as “all individuals impacted by PRC’s Data Incident, including all individuals who received notice of the Data Incident that occurred in August 2024.” The Settlement Class also includes Minor Subclass Members, which is defined as all “Settlement Class Members who were minors at the time of the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all Persons who timely and validly request exclusion from the Class; (2) the judge assigned to evaluate the fairness of this settlement (including any members of the Court’s staff assigned to this case); (3) PRC’s officers and directors, and (4) 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 Incident or who pleads nolo contendere to any such charge.

If you are not sure whether you are a Settlement Class Member, or if you lost or did not receive a Notice ID, you can contact the Settlement Administrator at:

- Email: info@PRCSettlement.com
- Call toll free, 24/7: 1-844-496-1068
- By mail: PRC Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799.

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

The Settlement Benefits

7. What does the Settlement provide?

PRC has agreed to establish a \$632,250.00 Settlement Fund. Part of the Settlement Fund will be used to pay for expenses like attorneys' fees and costs, the Service Award to the Plaintiffs, and the costs of administering the Settlement. All the rest of the Settlement Fund will be used to pay benefits that Class Members can claim.

Settlement Class Members who are minors will automatically receive the Minor Defense monitoring service described below. No claim is required. An enrollment code will be emailed to the minor’s parent or guardian.

Settlement Class Members may claim out-of-pocket losses and/or a *pro rata* payment.

BENEFITS

Minor Defense (Minors Only). Minors will automatically receive 8 years of CyEx’s Minor Defense Pro service. The service monitors a minor’s personal information, alerts parents or guardians if potential misuse is found, and helps remediate identity theft.

Out-of-Pocket Losses. If the Data Incident caused you or your minor child real, documented losses, you may file a claim for reimbursement. You can get back up to \$5,000.00.

This benefit covers out-of-pocket expenses including, but not limited to:

- (1) unreimbursed losses relating to fraud or identity theft;
- (2) professional fees, including attorneys' and accountants' fees;
- (3) fees for credit repair services;
- (4) costs associated with freezing or unfreezing credit with any credit reporting agency;
- (5) credit monitoring costs incurred on or after August 1, 2024, through the date you submit your claim; and
- (6) miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

You must send proof, like receipts, to establish a valid claim. You can add your own notes to explain other papers, but those notes alone are not enough to make a valid claim.

Class Counsel (**see Question 12**) believe that there is enough money in the Settlement Fund to pay out everyone's out-of-pocket loss claims. If it turns out that there is not enough to fully pay out everyone's out-of-pocket loss claims, everyone's claims may be reduced *pro rata*.

Pro Rata Cash Payment. All Settlement Class Members may submit a claim for a *pro rata* cash payment. After all expenses and other claims have been paid out, the money remaining in the Settlement Fund will be equally divided among everyone who claimed a *pro rata* cash payment. The actual amount may be more or less, depending mostly on the total value of Out-of-Pocket Loss claims.

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

- Email: info@PRCSettlement.com
- Call toll free, 24/7: 1-844-496-1068
- By mail: PRC 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?

Unless you opt-out of the Settlement (**see Question 15**), you won't be able to 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 of the Settlement Agreement (Section VIII) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.PRCSettlement.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.PRCSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

PRC 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, 1-844-496-1068, by email at info@PRCSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are filing a Claim Form on behalf of yourself or your minor child online, complete your claim by December 31, 2025. If you are filing a paper copy, your signed Claim Form along with any necessary documentation must be postmarked by December 31, 2025.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on January 13, 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 benefits 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 attorneys Terence R. Coates of Markovits, Stock & DeMarco, LLC; Tyler J. Bean of Siri & Glimstad LLP; and William B. Federman of Federman & Sherwood, to represent you and other Settlement 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 attorneys' fees and costs up to \$210,750.00. Class Counsel will also ask for a Service Award of \$3,000.00 for each of the Class Representatives. These expenses, along with the cost of administration, will be paid from the Settlement Fund.

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 a Settlement payment, but you will keep any rights you may have to sue PRC 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. Any Settlement Class Member who does not timely request for exclusion will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.

The deadline to exclude yourself from the Settlement is December 1, 2025.

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

- (1) the name of the Action: *Jackson, et al. v. Prentke Romich Company d/b/a PRC-Salttillo*, Case No. 24-cv-01708 , pending in the United States District Court for the Northern District of Ohio;
- (2) your full name and current mailing 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:

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

Your Request for Exclusion must postmarked by December 1, 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 in the Settlement Class and do not like the Settlement, you can object. That means telling the Court why you think it should not be approved. The Court will consider what you say.

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

To be valid, your objection must provide the following information:

- (1) the name of the Action: *Jackson, et al. v. Prentke Romich Company d/b/a PRC-Salttillo*, Case No. 24-cv-01708 , pending in the United States District Court for the Northern District of Ohio;
- (2) your full name, current mailing address, and telephone number;
- (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection;
- (4) proof that you are a Settlement Class Member (such as a copy of a Data Incident notice letter);
- (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) if you have objected to other class action settlements in the past 5 years, list those cases;
- (8) 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.

You must file your complete objection with the Clerk of Court by December 1, 2025. You must also send copies of the objection to both Class Counsel and counsel for Defendant.

Clerk of the Court	Class Counsel	Counsel for Defendants
Clerk of the Court 801 W. Superior Ave Cleveland, OH 44113-1829	Terence R. Coates MARKOVITS, STOCK & DEMARCO, LLC 119 East Court Street Suite 530 Cincinnati, Ohio 45202	Adam C. Smith McDonald Hopkins LLC 600 Superior Avenue Suite 2100 Cleveland, OH 44114

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 hearing on January 13, 2026, at 2:00 p.m. Eastern Time, in the United States District Court for the Northern District of Ohio, at 801 W. Superior Ave, Cleveland, OH 44113-1829.

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 Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. 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 hearing date and time may change without further notice. Please check www.PRCSettlement.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 want to, 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 completed and 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 of Settlement is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.PRCSettlement.com.

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

- Email: info@PRCSettlement.com
- Call toll free, 24/7: 1-844-496-1068
- By mail: PRC 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, 801 W. Superior Ave, Cleveland, OH 44113-1829.

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