

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Asheville Arthritis and Osteoporosis Center, P.A. notified you of a data incident, you may be eligible for benefits from a class action settlement.

This is not a solicitation from a lawyer, junk mail, or an advertisement. A Court authorized this Notice.

- A proposed \$500,000 settlement has been reached in a class action lawsuit known as *Stiwinter et al. v. Asheville Arthritis and Osteoporosis Center, P.A.*, Case No. 24-CVS-208570-100 (“Action”), filed in Buncombe County, North Carolina and transferred to the North Carolina Business Court.
- This Action arises out of a Data Incident and alleges that in or around May 2024, Defendant became aware of a Data Incident impacting certain company systems. The Data Incident was found to have compromised the private and personally identifying information stored in Defendant’s files, including patients’ name, address, date of birth, telephone number, Social Security number, and certain medical information such as medical notes, lab results, diagnosis, and health insurance information. Roughly 58,000 people were impacted because of this Data Incident. Defendant disputes Plaintiffs’ claims and denies any wrongdoing.
- All Settlement Class Members can receive one of the following benefits from the Settlement:
 - **Cash Payment A – Documented Losses:** All Settlement Class Members are eligible to recover compensation for up to \$5,000 per person for out-of-pocket losses incurred as a result of the Data Incident, including 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 the Data Incident through the date of the Claim Form Deadline; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.
 - **Cash Payment B – Alternative Cash Payment:** All Settlement Class Members may, as an alternative to Cash Payment A, make a claim for a pro rata Cash Payment from the Settlement Fund. The amount of the pro rata Cash Payment is estimated to be \$100 per Claimant. The Cash Payment may increase or decrease based upon the number of Claims approved. The pro rata Alternative Cash Payments will evenly distribute the net amount of the \$500,000 Settlement Fund after payment of all approved claims for documented losses, Settlement Administration Costs, and any award of attorneys’ fees, expenses, and Service Awards.
- Included in this settlement as a Settlement Class Member are all individuals to whom Defendant sent individual notification that they were affected by the Data Incident.
- Excluded from the Settlement Class are (a) all persons who are employees, directors, officers, and agents of Defendant; (b) governmental entities; and (c) the judge assigned to the Action, that judge’s immediate family, and Court staff.
- 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	<p>You must submit a valid Claim Form to receive benefits from this Settlement.</p> <p>Claim Forms must be submitted online or mailed, postmarked no later than January 26, 2026.</p>
Do Nothing	<p>If you do nothing, you remain in the Settlement.</p> <p>You give up your right to sue, and you will not get any cash compensation or reimbursement as a Settlement Class Member.</p>
Exclude Yourself	<p>Get out of the Settlement. Get no money. Keep your rights.</p> <p>This is the only option that allows you to keep your right to sue about the claims in this litigation. You will not get any money from the Settlement.</p> <p>Your request for exclusion must be postmarked no later than January 26, 2026.</p>

File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than January 26, 2026 .
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. See Question 18 for more details. The Final Approval Hearing is scheduled for February 9, 2026, at 10 a.m. ET .

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
1. How do I know if I am affected by the litigation and Settlement?	
2. What is this case about?	
3. Why is there a settlement?	
4. Why is this a class action?	
5. How do I know if I am included in the Settlement Class?	
THE SETTLEMENT BENEFITS	4
6. What does this Settlement provide?	
7. How do I submit a Claim Form?	
8. What am I giving up as part of the Settlement Class?	
9. Will the Class Representatives receive compensation?	
EXCLUDE YOURSELF	4
10. How do I exclude myself from the Settlement?	
11. If I do not exclude myself, can I sue later?	
12. What happens if I do nothing at all?	
THE LAWYERS REPRESENTING YOU.....	5
13. Do I have a lawyer in the case?	
14. How will the lawyers be paid?	
OBJECTING TO THE SETTLEMENT	5
15. How do I tell the Court that I do not like the Settlement?	
16. What is the difference between objecting and asking to be excluded?	
THE FINAL APPROVAL HEARING.....	6
17. When and where will the Court decide whether to approve the Settlement?	
18. Do I have to come to the hearing?	
19. May I speak at the hearing?	
GET MORE INFORMATION	7
20. How do I get more information about the Settlement?	

BASIC INFORMATION

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

You are a Settlement Class Member if you are an individual to whom Defendant sent individual notification that you were affected by the Data Incident.

The Settlement Class specifically excludes (a) all persons who are employees, directors, officers, and agents of Defendant; (b) governmental entities; and (c) the judge assigned to the Action, that judge's immediate family, and Court staff.

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

2. What is this case about?

This case is known as *Stiwinter et al. v. Asheville Arthritis and Osteoporosis Center, P.A.*, Case No. 24-CVS-208570-100 ("Action"), filed in Buncombe County, North Carolina and transferred to North Carolina Business Court. The Persons who sued are called the "Plaintiffs," and the entity they sued, Asheville Arthritis and Osteoporosis Center, P.A., is known as the "Defendant" in this case.

Plaintiffs filed a lawsuit against Defendant, individually and on behalf of anyone who received a notice letter informing them of the Data Incident.

This litigation arises out of a Data Incident and alleges that in or around May of 2024, Defendant became aware of a Data Incident impacting certain company systems. The Data Incident was found to have compromised the private and personally identifying information stored in Defendant's files, including patients' names, addresses, dates of birth, telephone numbers, Social Security numbers, and certain medical information such as medical notes, lab results, diagnosis, and health insurance information. Roughly 58,000 people were impacted because of this Data Incident. Defendant disputes Plaintiffs' claims and denies any wrongdoing.

3. Why is there a settlement?

By agreeing to settle, the Parties desire to settle the Action and all claims arising out of or related to the allegations or subject matter of the amended class action complaint on the terms and conditions set forth herein for the purpose of avoiding the burden, expense, risk, and uncertainty of continuing to litigate the Action. The Class Representatives, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, in the best interests for Settlement Class Members. The Court did not decide in favor of the Plaintiffs or Defendant. Full details about the proposed settlement are found in the Settlement Agreement available at ArthritisDataBreach.com.

4. Why is this a class action?

In a class action, one or more people called "Class Representatives" sue on behalf of all people who have similar claims. These people together are the "Class" or "Class Members."

5. How do I know if I am included in the Settlement Class?

You are included in the Settlement Class if you are an individual identified on the Class List whose certain Private Information may have been involved in the Data Incident who does not timely elect to be excluded from the Settlement Class. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit ArthritisDataBreach.com, call toll-free +1 877-934-6987, or write to Asheville Arthritis Data Breach Settlement Administrator, c/o Epiq, P.O. Box 6075, Portland, OR 97228-6075.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

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

- **Cash Payment A – Documented Losses:** All Settlement Class Members are eligible to recover compensation for up to \$5,000 per person for out-of-pocket losses incurred as a result of the Data Incident, including 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 the Data Incident through the date of the Claim Form Deadline; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.
- **Cash Payment B – Alternative Cash Payment:** All Settlement Class Members may, as an alternative to Cash Payment A, make a claim for a pro rata Cash Payment from the Settlement Fund. The amount of the pro rata Cash Payment is estimated to be \$100 per Claimant. The Cash Payment may increase or decrease based upon the number of Claims approved. The pro rata Alternative Cash Payments will evenly distribute the net amount of the \$500,000 Settlement Fund after payment of all approved claims for documented losses, Settlement Administration Costs, and any award of attorneys' fees, expenses, and Service Awards.

7. How do I submit a Claim Form?

All Claim Forms will be reviewed by the Settlement Administrator for completeness and plausibility. You must file a Claim Form to get cash compensation or reimbursement from the Settlement Fund under the proposed Settlement. Claim Forms must be submitted online or postmarked no later than **January 26, 2026**. For more information, please visit ArthritisDataBreach.com, or you can call the Settlement Administrator at +1 877-934-6987 for a Claim Form.

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

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue Defendant or any entity which is controlled by, controlling or under common control with Defendant and their past, present, and future direct and indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, divisions, officers, directors, shareholders, members, agents, servants, employees, partners, attorneys, insurers, reinsurers, benefit plans, predecessors, successors, managers, administrators, executors, and trustees (collectively, the "Released Parties") regarding the claims in this case.

The Settlement Agreement, which includes all provisions about Released Claims, releases, and Released Parties, is available at ArthritisDataBreach.com.

The only way to keep the right to sue is to exclude yourself (*see* Question 10), otherwise you will be included in the Settlement Class, and, if the Settlement is approved, you give up the right to sue for the claims in this case.

9. Will the Class Representatives receive compensation?

Yes. If approved by the Court, the Class Representatives will each receive a Service Award of up to \$2,500, to compensate them for their services and efforts in bringing the Action. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must "opt out" by sending a timely written request for exclusion. Your request for exclusion must (a) state your full name and address; (b) contain your personal and original signature (or the original signature of a person authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf with respect to a claim or right such as those in the Action); and (c) state your intent to be excluded from the Settlement Class and from the Settlement, not to participate in the Settlement, and/or to waive all rights to the benefits of the Settlement.

Your written request for exclusion must be postmarked no later than **January 26, 2026**, to the following address:

Asheville Arthritis Data Breach Settlement Administrator
c/o Epiq
P.O. Box 6075
Portland, OR 97228-6075

If you exclude yourself, you will not be able to receive any cash benefits from the Settlement, and you cannot object to the Settlement at the Final Approval Hearing. You will not be legally bound by anything that happens in the litigation, and you will keep your right to sue Defendant 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 the Released Parties (listed in Question 8) 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 reimbursement from the settlement; and you will not be able to start or proceed with a lawsuit or be part of any other lawsuit against the Released Parties (listed in Question 8) about the settled Claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Kenneth Grunfeld of Kopelowitz Ostrow P.A. and Tyler J. Bean of Siri & Glimstad LLP (called “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 attorneys’ fees not to exceed one-third of the total Settlement Fund (or \$166,666.67) for fees in prosecuting the litigation plus reasonable litigation expenses. A copy of Class Counsel’s Fee and Expense Application and Service Award for Class Representatives will be posted on the Settlement Website, ArthritisDataBreach.com, before the Final Approval Hearing. The Court will make the final decisions as to the amounts 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 you do not agree with the proposed Settlement or some part of it, you must file an objection with the Court and with the Settlement Administrator by **January 26, 2026** (the “Objection Deadline”) stating why you do not think the Settlement should be approved.

To be valid, each objection must include

- a. the objector’s full name, mailing address, phone number, and email address (if any);
- b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector’s counsel;
- c. the number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector’s prior objections that were issued by the trial and appellate courts in each listed case;
- d. the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys’ Fees, Costs, and Service Awards;

- e. the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection; and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- f. the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- g. a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- h. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- i. the objector's signature (an attorney's signature is not sufficient).

Your objection must be filed with the Clerk of Court, mailed to the Settlement Administrator, and include the case name and docket number, titled *Stiwinter et al. v. Asheville Arthritis and Osteoporosis Center, P.A.*, Case No. 24-CVS-208570-100 by **January 26, 2026**, at the following addresses:

CLERK OF THE COURT	SETTLEMENT ADMINISTRATOR
The Honorable Michael L. Robinson Chief Business Court Judge North Carolina Business Court Worrell Professional Center - Room 3206 1965 Wake Forest Road Winston-Salem, NC 27109	Asheville Arthritis Data Breach Settlement Administrator c/o Epig P.O. Box 6075 Portland, OR 97228-6075

If you do not submit your objection with all requirements, or if your objection is not received by **January 26, 2026**, you will be considered to have waived all objections and will not be entitled to speak at the Final Approval Hearing.

16. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court you don't 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 **February 9, 2026, at 10 a.m. ET** at the North Carolina Business Court, 1965 Wake Forest Road, Room 3206, Winston-Salem, NC 27109. 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 for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if the proposed Settlement should be finally approved. If there are valid objections, the Court will consider them and will 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 Expenses to Class Counsel and the request for a Service Award to the Class Representatives.

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. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

19. May I speak at the hearing?

Yes. You may speak at the Final Approval Hearing, but you must ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required for you to make an appearance at the hearing. You cannot speak at the hearing if you exclude yourself from the Settlement.

GET MORE INFORMATION**20. 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 litigation, including a copy of the Settlement Agreement, the Amended Class Action Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Fee and Expense Application when available, Service Award for Class Representatives, and more, please visit the Settlement Website or call +1 877-934-6987. You may also contact the Settlement Administrator, Epiq Class Action & Claims Solutions, Inc., at Asheville Arthritis Data Breach Settlement Administrator, c/o Epiq Class Action & Claims Solutions, Inc., P.O. Box 6075, Portland, OR 97228-6075.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR ASHEVILLE
ARTHRITIS' COUNSEL.**