#### NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Jon Mulkey, et al. v. Four Hands, LLC
Case No. D-1-GN-25-001854
53<sup>rd</sup> Judicial District Court of Travis County, Texas

IF YOU ARE A PERSON IN THE UNITED STATES WHOSE PRIVATE INFORMATION WAS POTENTIALLY ACCESSIBLE AS A RESULT OF THE DATA INCIDENT, INCLUDING THOSE WHO WERE SENT NOTIFICATION FROM DEFENDANT THAT THEIR PRIVATE INFORMATION WAS POTENTIALLY ACCESSIBLE AS A RESULT OF THE DATA INCIDENT, YOU ARE ELIGIBLE TO RECEIVE A SETTLEMENT CLASS MEMBER BENEFIT FROM A CLASS ACTION

You are not being sued. A Court has authorized this Long Form Notice ("Notice"). This is not a solicitation from a lawyer.

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

- A Court authorized this Notice, to those that are eligible to receive Settlement Class Member Benefits from a proposed Class Action Settlement. A Settlement has been reached with Plaintiff Jon Mulkey on behalf of himself and all others similarly situated and Defendant Four Hands, LLC ("Four Hands" or "Defendant") in a class action lawsuit and is pending in the 53<sup>rd</sup> Judicial District Court of Travis County, Texas. This class action lawsuit concerned the cyber incident that Four Hands experienced occurred on or about December 2023 to January 2024(the "Data Security Incident"). Certain files that contained private information were potentially accessed. These files may have contained personal information such as names; Social Security numbers; dates of birth; financial account information; passport numbers; driver's license numbers; and/or state ID card numbers.
- The lawsuit is called *Jon Mulkey, et al. v. Four Hands, LLC*, Case No. D-1-GN-25-001854, pending in the 53<sup>rd</sup> Judicial District Court of Travis County, Texas (the "Litigation").
- Defendant denies any wrongdoing whatsoever.
- The Court has not decided in favor of the Plaintiff or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Class Representative appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel, think the Settlement is best for all Settlement Class Members.

- Defendant's records indicate that you are a Class Member, and eligible to benefits under the Settlement. You may have received a previous notice directly from Four Hands.
- 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 FORM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.	January 28, 2026
	The fastest way to submit your Claim Form is online at www.FourHandsDataSettlement.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.	
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant relating to the Data Incident.	December 29, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	You can write the Court about why you agree or disagree with the Settlement or the Application for Attorneys' Fees, Costs, and Service Awards. The Court cannot order a different settlement. You can also ask to speak at the Final Approval Hearing on <b>February 17, 2026</b> , about the fairness of the Settlement, with or without your own attorney.	December 29, 2025
DO NOTHING	You will not receive any Settlement Class Member Benefit from this class action Settlement, but will remain a Settlement Class Member and be bound by the Releases.	No Deadline

These rights and options as a Settlement Class Member—and the deadlines to exercise them—are explained in this Notice.

The Court still will have to decide whether to approve the Settlement. Settlement Class Member Benefits will be made available only if the Court approves the Settlement and after any possible appeals are resolved.

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# **Basic Information**

### 1. Why was this Notice issued?

The 53<sup>rd</sup> Judicial District Court of Travis County, Texas authorized this Notice. You have a right to know about the Settlement, 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 *Jon Mulkey, et al. v. Four Hands, LLC*, Case No. D-1-GN-25-001854, pending in the 53<sup>rd</sup> Judicial District Court of Travis County, Texas. The person that filed this lawsuit is called the "Plaintiff" (or "Class Representative") and the company they sued, Four Hands, LLC, is called the "Defendant."

#### 2. What is this lawsuit about?

This lawsuit alleges that Four Hands, LLC experienced a cyber incident during December 2023 to January 2024. Specifically, unauthorized actors may have gained access to certain sensitive information. These files may have contained personal information such as names; Social Security numbers; dates of birth; financial account information; passport numbers; driver's license numbers; and/or state ID card numbers. Defendant notified potentially affected individuals about the Data Incident in compliance with applicable law.

Defendant denies any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendant has done anything wrong.

#### 3. What is a class action?

In a class action, one or more people called "Class Representatives" or "Plaintiffs" sue on behalf of all people who have similar claims. Together, all of these people are called a "Settlement Class," and the individuals are called "Settlement Class Members." One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

## 4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Class Representative appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel, 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 Class as: "All individuals residing in the United States whose Personal Information was potentially accessible in the Data Security Incident experienced by Four Hands which began on or around December 27, 2023, including all those who received notice of the Data Security Incident."

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

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

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@FourHandsDataSettlement.com
- Call toll free, 24/7: 1- (844) 496-1289
- By mail: Four Hands 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.FourHandsDataSettlement.com.

# **The Settlement Benefits**

## 7. What does the Settlement provide?

The Settlement provides a number of different benefits available to Settlement Class Members who submit valid claims. All Class Members can enroll in two years of **Credit Monitoring Services** by a credit agency. In addition to Credit Monitoring Services, Class Members may choose between **two payment options**:

OR

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

- Out-of-Pocket Expenses
- Losses for Identity Theft or Fraud
- Reimbursement for Lost Time

**OPTION 2:** Alterantive Cash Payment.

• Receive a one-time \$15.00 cash payment

There is an aggregate cap of \$250,000.00 on these benefits. This means that if the total value of benefits claimed is over \$250,000.00, everyone's payments will be reduced pro rata so that they add up to \$250,000.00. The value of Credit Monitoring Services is not counted toward this cap; everyone who claims this benefit will receive it unchanged.

More information about each of these benefits is below. Full details are in Section II of the Settlement Agreement, available at www.FourHandsDataSettlement.com.

#### **CREDIT MONITORING SERVICES**

All Class Members can enroll in two years of Credit Monitoring Services by a credit agency. This benefit includes \$1 million of identity theft protection insurance.

This service will be made available to all Settlement Class Members who choose to enroll regardless of whether they submit a Claim for Ordinary Out-of-Pocket Losses, Ordinary Attested Time, Extraordinary Losses, and/or Alternative Cash Payment. A unique redemption code allowing Settlement Class Members to enroll in these services will be sent to each Settlement Class Member who submits an Approved Claim for such services.

#### **PAYMENT OPTION 1**

**Out-of-Pocket Expenses.** If you incurred actual, <u>documented</u> out-of-pocket expenses due to the Data Security Incident, you can get back up to **\$300.00** upon submission of an Approved Claim and supporting documentation. The losses must have occurred between December 27, 2023, and January 28, 2026.

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. Documentation supporting Ordinary Out-of-Pocket Expenses can include receipts or other documentation not "self-prepared" by the Settlement Class Member that documents the costs incurred. "Self-prepared" documents, such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support to other submitted documentation.

**Losses for Identity Theft or Fraud.** If you lost money because of identity theft or fraud, you can get back up to \$3,000.00.

You will need to show that:

- the theft or fraud was probably caused by the Data Security Incident
- the losses are not already covered by Out-of-Pocket Expenses or Reimbursement for Lost Time
- 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 December 27, 2023, and January 28, 2026.

You are required to submit **two forms** of proof, like bank statements or police reports, 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 \$300.00 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.

#### **PAYMENT OPTION 2**

**Alternative Cash Payment.** Instead of the benefits in Cash Payment Option 1, you may claim a one-time **\$15.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

The maximum total amount for which Defendant is obligated to pay to settle all claims for ordinary unreimbursed losses, time spent, extraordinary unreimbursed losses, and alternative cash payments shall be \$250,000.00. In the event that the aggregate claims of the class for ordinary unreimbursed losses, time spent, extraordinary unreimbursed losses, and alternative cash payments exceeds \$250,000.00, then the value of such payments shall be reduced on a pro rata basis, such that the aggregate value of all payments does not exceed \$250,000.00.

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

- Email: info@FourHandsDataSettlement.com
- Call toll free, 24/7: 1- (844) 496-1289
- By mail: Four Hands 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?

Defendant and its affiliates will receive a Release from all claims that could have been or that were brought against Defendant relating to the Data Incident. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant, and its present and former parents, subsidiaries, divisions, departments, affiliates, predecessors, successors and assigns, and any and all of their past, present, and future directors, officers, executives, officials, principals, stockholders, heirs, agents, insurers, reinsurers, members, attorneys, accountants, actuaries, fiduciaries, advisors, consultants, representatives, partners, joint venturers, licensees, licensors, independent contractors, subrogees, trustees, executors, administrators, clients, customers, data owners, associated third parties, predecessors, successors and assigns, and any other person acting on Defendant's behalf, in its capacity as such and assigns of each of them as well as covered entities associated with the Data Incident. These Releases are described in Section IX of the Settlement Agreement, which is available at www.FourHandsDataSettlement.com. If you have any questions, you can talk to the law firms listed in Question 12 for free or you can talk to your own lawyer.

# **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.FourHandsDataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Four Hands 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, (844) 496-1289, by email info@FourHandsDataSettlement.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 January 28, 2026. 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 January 28, 2026.

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

The Court will hold a final approval hearing on February 17, 2026 (see Question 18). If the Court approves the Settlement, there may be appeals and resolving them can take time. It also takes time for all of the Claim Forms to be processed. Please be patient. Settlement payments and Credit Monitoring will begin after the Settlement has obtained Court approval and the time for all appeals has expired.

# **The Lawyers Representing You**

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

Yes, the Court appointed attorney Cassandra P. Miller of Strauss Borrelli PLLC, to represent you and other Class Members ("Class Counsel"). If you want to be represented by your own lawyer, you may hire one at your own expense.

#### 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 shall apply to the Court for an award of attorneys' fees not to exceed\$142,500.00. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Class Counsel will include a request for a Service Award to the Class Representative in recognition for his contribution to this Action not to exceed \$5,000.00. The Service Award payment to the Class Representative shall be separate and apart from his entitlement to benefits from the Settlement Fund.

Any attorneys' fees, costs and Service Award payments must be approved by the Court. The Court may award less than the amounts requested.

# **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 Four Hands 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 December 29, 2025.

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

- (1) the name of the Action: *Jon Mulkey v. Four Hands, LLC*, Case No. D-1-GN-25-001854, pending in the 53<sup>rd</sup> District Court of Travis County, Texas;
- (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:

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

Your Request for Exclusion must be postmarked, or emailed by December 29, 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: *Jon Mulkey v. Four Hands, LLC*, Case No. D-1-GN-25-001854, pending in the District Court of Travis County, Texas;
- (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 December 29, 2025. You must also send a copy to the Settlement Administrator.

Clerk of the Court	Settlement Administrator	
Clerk of the Court	Four Hands Data Security Incident Settlement	
53rd Judicial District Court of Travis County	ATTN: Objections	
1700 Guadalupe St	P.O. Box 25226	
Austin, TX 78701	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 hearing on February 17, 2026, at 9:00 Central Time, in the 53<sup>rd</sup> Judicial District Court of Travis County, Texas, at 1700 Guadalupe St, Austin, TX 78701.

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 Representatives who brought this Action on behalf of the Class. 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.FourHandsDataSettlement.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.FourHandsDataSettlement.com.

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

- Email: info@FourHandsDataSettlement.com
- Call toll free, 24/7: 1- (844) 496-1289
- By mail: Four Hands 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, 53<sup>rd</sup> Judicial District Court of Travis County, Texas, at 1700 Guadalupe St, Austin, TX 78701.

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