

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Dean, et al. v. New York Blood Center, Inc., et al.

Case No. 62-CV-25-5975

Ramsey County District Court, Minnesota

IF YOU RECEIVED NOTICE THAT YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE JANUARY 2025 NEW YORK BLOOD CENTER, INC. OR MEMORIAL BLOOD CENTERS DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS

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 New York Blood Center, Inc. and Memorial Blood Centers (the “Blood Centers” or “Defendants”) in a class action lawsuit. This case is about the targeted cyberattack on the Blood Centers' computer systems that occurred in January 2025 (the “Data Incident”). Certain files that contained private information were accessed. These files may have contained personal information such as names; dates of birth; gender; Social Security numbers; blood type; certain blood test results; financial information for direct deposit; and other sensitive information.
- The lawsuit is called *Dean, et al. v. New York Blood Center, Inc., et al.*, Case No. 62-CV-25-5975. It is pending in the Ramsey County District Court, Minnesota (the “Litigation”).
- The Blood Centers deny that they 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 and risks, disruptions, and uncertainties of continuing the Litigation.
- The Blood Centers' records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from the Blood Centers.
- 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 or payments 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.BloodCentersSettlement.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>	February 11, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or 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.	January 12, 2026
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.	January 12, 2026
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 or payments 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 Ramsey County District Court, Minnesota, 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 *Dean, et al. v. New York Blood Center, Inc., et al.*, Case No. 62-CV-25-5975. It is pending in the Ramsey County District Court, Minnesota. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the companies they sued, New York Blood Center, Inc. and Memorial Blood Centers, are called the “Defendants.”

2. What is this lawsuit about?

This lawsuit alleges that during the January 2025 targeted cyberattack on the Blood Centers' computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names; dates of birth; gender; Social Security numbers; blood type; certain blood test results; financial information for direct deposit; and other sensitive information.

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 Shanell Dean, Jackie De Leon-Wallin, and Allison Storchey. 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 Defendants are 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. The 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 court has defined the Class this way: “All persons residing in the United States who were sent notice that their Private Information was compromised in the Data Incident experienced by Defendants in January 2025.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all persons who are directors, officers, and agents of Defendants; (2) governmental entities; (3) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (4) any judges assigned to this case and their staff and immediate family; and (5) 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 Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@BloodCentersSettlement.com
- Call toll free, 24/7: 1-833-417-4928
- By mail: Blood Centers Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

The Blood Centers will establish a Settlement Fund of \$500,000.00. The Settlement Fund will first be used to pay court-approved attorneys' fees and costs, Service Award payments for the Plaintiffs, and the costs of administering the Settlement. The net remaining money will be used to pay for the benefits described below.

All Class Members can claim one year of **medical data monitoring services** and one of two **cash payment** options:

OPTION A: Cash Payment A – Documented Losses

- Get back up to \$2,500.00 for documented losses

OR

OPTION B: Cash Payment B – Alternate Cash

- Receive a one-time \$20.00 cash payment

The benefits are explained in more detail on the following pages.

Medical data monitoring. All Class Members are eligible to enroll in one year of **CyEx Medical Shield Pro**. 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.

Cash Payment A – Documented Losses. 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
- 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 January 26, 2025, and February 11, 2026.

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. Your proof or notes should show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

Cash Payment B – Alternate Cash. *Instead of* Cash Payment A, you may claim a one-time **\$20.00** payment. No documentation is needed to claim this payment. This amount may increase or decrease based on the amount of Valid Claims.

If there is not enough money in the Settlement Fund to pay all claims, everyone’s cash payments will be reduced *pro rata*. Cash payments may also be increased *pro rata* based on the number of claims made.

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

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- Call toll free, 24/7: 1-833-417-4928
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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 the Blood Centers about the issues that this Settlement covers. The “Releases” section of the Settlement Agreement (Section XII) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.BloodCentersSettlement.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.BloodCentersSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Blood Centers Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-417-4928, by email info@BloodCentersSettlement.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 **February 11, 2026** by 11:59 p.m. CT. 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 **February 11, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on February 10, 2026 (**see Question 18**). The Final Approval Hearing may be held remotely. 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 Leanna A. Loginov of Shamis & Gentile, P.A.; Mariya Weekes of Milberg Coleman Bryson Phillips Grossman, PLLC; and Raina Borrelli of Strauss Borrelli PLLC, to represent you and other 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 one-third of the \$500,000.00 Settlement Fund as reasonable attorneys' fees (or up to \$166,666.66), and up to \$2,000.00 for reimbursement of litigation costs. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments will also 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 Settlement benefits or payment. However, you will keep any rights you may have to sue the Blood Centers 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 **January 12, 2026**.

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

- (1) your full name, mailing address, telephone number, and email address (if any);
- (2) personal signature; and
- (3) 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:

Blood Centers Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **January 12, 2026**.

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 Litigation: *Dean, et al. v. New York Blood Center, Inc., et al.*, Case No. 62-CV-25-5975, pending in the Ramsey County District Court, Minnesota;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector’s counsel;
- (4) 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;
- (5) 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 Award, and whether they will appear at the Final Approval Hearing;
- (6) 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;

- (7) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (8) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- (9) the objector's signature (an attorney's signature is not sufficient)

For your objection to be valid, it must meet each of these requirements.

Class Counsel and/or Defendants' Counsel may conduct limited discovery on any objector or objector's counsel, including taking depositions and propounding document requests.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **January 12, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of the Court	Settlement Administrator
Ramsey County Courthouse 15 W. Kellogg Blvd. St. Paul, MN 55102 Court Administrator: Heather Kendall	Blood Centers Data Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958
Class Counsel	Counsel for Defendants
Mariya Weekes Milberg Coleman Bryson Phillips Grossman, PLLC 201 Sevilla Avenue, Suite 200 Coral Gables, FL 33134	Casie D. Collignon Baker & Hostetler, LLP 1801 California Street, Suite 4400 Denver, CO 80202

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 **February 10, 2026 at 9:00 a.m. Central Time**. The hearing may be held remotely.

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 payments to the Class Representatives. 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.BloodCentersSettlement.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.BloodCentersSettlement.com.

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

- Email: info@BloodCentersSettlement.com
- Call toll free, 24/7: 1-833-417-4928
- By mail: Blood Centers Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court.

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