

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

A COURT AUTHORIZED THIS NOTICE. THIS IS NOT A SOLICITATION FROM A LAWYER.

YOU MAY RECEIVE MONEY FROM A SETTLEMENT.

**If you had a loan originated through or serviced by Upstart Network and you received communications from Upstart, made payments to Upstart, or had your account reported to the credit reporting agencies after you filed for bankruptcy in the Eastern District of Kentucky or Western District of Kentucky, you may be eligible for benefits from this class settlement.**

**What is this?** This is a notice of a proposed settlement in a class action lawsuit. This notice explains your legal rights.

**What is this lawsuit about?** Melanie Stephens and Jessica Johnson filed a class action complaint against Upstart, In re Stephens, United States Bankruptcy Court for the Eastern District of Kentucky, Case No. 23-03001. A matching action, In re Brody was filed by David Brody in the United States Bankruptcy Court for the Western District of Kentucky, Case No. 25-03044. The complaints allege Upstart violated the automatic stay in certain bankruptcies by sending certain communications, collecting payments, and reporting certain credit information. Upstart denies these allegations and any wrongdoing. The Court has not determined who is right or wrong in this lawsuit.

**Why am I getting this notice?** You were identified as someone who may be a member of the settlement class.

**What does the settlement provide?** Upstart has agreed to pay up to a total of \$300,000 to class members to resolve both lawsuits. Settlement Class Members can receive a cash award to compensate them, as follows: (1) If you made certain payments to Upstart after your bankruptcy was filed, you may receive the amount of those payments plus an additional \$800, (2) If Upstart reported certain credit information about your account(s), you may receive \$100, and (3) If you received certain communications after filing bankruptcy, you may receive a pro rata share of the remaining funds. Upstart will also pay settlement administration costs up to \$25,000, Class Counsel's attorneys' fees and costs up to \$100,000, and Plaintiffs' incentive award up to \$10,000 (subject to Court approval). Neither the incentive award nor the attorneys' fees will reduce the amount paid to Settlement Class Members. For more information, please visit [www.UNIClassAction.com](http://www.UNIClassAction.com) (the "Settlement Website").

**How do I get a payment?** If you do not opt out of the settlement, the Settlement Administrator will issue and mail a check to you.

**Do I have to be included in the settlement?** No. If you do not want to receive money from this settlement and you want to keep the right to sue or continue to sue Upstart on your own, then you must exclude yourself from the settlement. You will not get any money from this settlement if you exclude yourself. The Court will exclude any class member who properly requests exclusion by **March 9, 2026**. Please visit the Settlement Website for information regarding the manner in which such a request must be made.

**If I don't like something about the settlement, how do I tell the Court?** If you don't exclude yourself from the settlement, you may object to any part of the settlement. In order to object, you must submit your written objection by **March 9, 2026**. Please visit the Settlement Website for information regarding the manner in which such an objection must be made. You may appear at the Final Approval Hearing through an attorney, but you do not have to do so. If you or your attorney intends to appear at the Final Approval Hearing you must indicate that in your written objection.

**What if I do nothing?** If you do nothing, you will be eligible for a payment. All Settlement Class Members who do not opt out will be bound by the settlement and the decisions of the Court, and will release Upstart (and their agents and affiliates, among others) from liability for claims relating to those alleged in the lawsuit.

**When are the Final Approval Hearings?** The Courts will hold hearings in these cases to consider whether to approve the settlement, for the Eastern District the parties have asked that it be on **March 19, 2026, at 9:00 a.m.** in Room #200 of United States Bankruptcy Court, 100 E Vine St # 200, Lexington, KY 40507, for the Western District the parties have asked that it be on **April 7, 2026, at 11:00 a.m.** in Courtroom #2 of United States Bankruptcy Court, 5th Fl. (7th St. Elevators), 601 W. Broadway, Louisville, KY 40202. The hearing dates and times are subject to court approval and may change. **Please visit the website to confirm the hearing dates and times.** You or your lawyer may go to the hearing, at your own expense, but you are not required to do so.

**How do I get more information about the settlement?** This notice is only a summary. More information is available at [www.UNIClassAction.com](http://www.UNIClassAction.com) or by calling (888) 262-6044.