

Superior Court of the State of California for the County of Santa Clara

Wright, et al. v. Crossroads Trading Co., Inc.

Case No. 25CV479119

If you are an individual who was notified by Crossroads Trading Co., Inc. that your private information was potentially impacted by a February 15, 2025, data security incident, you may be entitled to money and other benefits as part of this settlement of a class action lawsuit.

A California State Court authorized this Notice. You are not being sued.

This is not a solicitation from a lawyer.

Your legal rights are affected regardless of whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	You must submit a claim to receive payment and/or credit monitoring. You will be bound by the Settlement. The deadline to submit a Claim Form is October 13, 2026 .
EXCLUDE YOURSELF FROM THE SETTLEMENT	Get no payment. Allows you to bring another lawsuit against Crossroads about the same issues. The deadline to exclude yourself from the Settlement is September 14, 2026 .
OBJECT TO THE SETTLEMENT	Tell the Court why you don't like the Settlement. The deadline to object is September 14, 2026 .
ATTEND THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing. The Final Approval Hearing will be held on January 13, 2027 .
DO NOTHING	Get no payment or credit monitoring. Give up rights resolved by the Settlement.

These rights and options—**and the deadlines to exercise them**—are explained in this Notice. For complete details, please see the Settlement Agreement, whose terms control, available at www.CrossroadsSettlement.com.

BASIC INFORMATION

1. What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the alleged harm.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

2. What is this lawsuit about?

Beginning in April 2025, a series of class action lawsuits were filed against Crossroads on behalf of current and former employees, customers, and other individuals whose private information was potentially impacted in the Data Security Incident. Those lawsuits were consolidated into a single proceeding in which the plaintiffs allege that Crossroads failed to properly secure and safeguard people's private information and, as a result, their privacy has been violated and their data has been compromised.

Crossroads denies that it did anything wrong, and instead asserts that it had appropriate safeguards in place, and that no one has been harmed as a result of the Data Security Incident.

“Private Information” alleged to have been accessed includes, but is not limited to, names, dates of birth, addresses, contact information, driver’s license numbers or other state identification numbers, Social Security numbers, financial account information, and passport information.

You can access a complete copy of the proposed Settlement and other key documents in this lawsuit at:

www.CrossroadsSettlement.com

3. Why is there a Settlement?

The parties agreed to settle the lawsuit, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The Settlement is on behalf of the people who brought the case and all members of the Settlement Class, which includes all individuals residing in the United States whose Private Information may have been compromised or otherwise impacted in the Data Security Incident, including all those who received notice of the Data Security Incident (“Settlement Class Members”).

The Court has not decided this case in favor of either side.

WHO’S INCLUDED IN THE SETTLEMENT?

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

If you are an individual residing in the United States whose Private Information may have been compromised or otherwise impacted in the Data Security Incident, and/or you received notice of the Data Security Incident, you may be a member of the class and entitled to money and credit monitoring.

THE SETTLEMENT BENEFITS

5. What does the Settlement provide?

The Settlement provides Settlement Class Members with credit monitoring services, payments for out-of-pocket losses, and alternative cash payments, subject to the submission of certain information and documentation.

Credit Monitoring Services: Settlement Class Members may submit a Claim Form to receive two years of complimentary three-bureau credit monitoring services.

Documented Loss Payment: Settlement Class Members may submit a Claim Form to receive up to \$5,000 for a Documented Loss Payment (monetary losses incurred when attempting to remedy issues that are fairly attributable to the Data Security Incident and incurred on or after February 15, 2025). Monetary losses must be accompanied by documentation and may include:

- Long distance telephone charges;
- Cell phone minutes (if charged by the minute);
- Internet usage charges (if charged by the minute or incurred solely as a result of the Data Security Incident);
- Costs of credit reports purchased between February 15, 2025, and October 13, 2026;
- Documented costs paid for credit monitoring services and/or fraud resolution services purchased between February 15, 2025, and October 13, 2026;
- Documented expenses directly associated with dealing with identity theft or identity fraud resulting from the Data Security Incident; and
- Any other Documented Loss incurred that is fairly traceable to the Data Security Incident as determined by the Settlement Administrator.

Alternative Cash Payment: Settlement Class Members who do not file a claim for a Documented Loss Payment may submit a Claim Form to receive an Alternative Cash Payment currently estimated to be \$25. Settlement Class Members who are residents of California or who resided in California at any point between February 15, 2025, and October 13, 2026, may submit a Claim Form to receive a California Statutory Cash Payment currently estimated to be \$100. California Statutory Cash Payments may be requested in conjunction with either (1) a Documented Loss Payment, or (2) an Alternative Cash Payment.

Crossroads has agreed to pay \$600,000 into a Settlement Fund. This money will be used to pay valid claims submitted by Settlement Class Members and will also be used to pay for costs and fees approved by the Court, including the cost of administering this Settlement. Members of the Settlement Class will release their claims as part of the Settlement, which means they cannot sue Crossroads for the same issues in this lawsuit. The full terms of the release can be found in the Settlement Agreement available at the Settlement Website, www.CrossroadsSettlement.com.

If there is money left over after the claims process is completed, it will be donated to a recipient mutually agreed upon by the Parties and approved by the Court.

HOW TO GET BENEFITS

6. How do I make a Claim?

If you wish to receive money and/or credit monitoring, you must submit a completed Claim Form to the Settlement Administrator online or download a Claim Form at www.CrossroadsSettlement.com and mail a completed copy to the Settlement Administrator (address below):

Wright, et al. v. Crossroads Trading Co., Inc.
c/o Kroll Settlement Administration
PO Box 225391
New York, NY 10150-5391
(833) 930-0258

All Claim Forms must be received online or postmarked on or before October 13, 2026. Settlement payments will be distributed on a reasonable timeframe, once all Claim Forms have been collected and processed, and only after the Court has issued a final approval order.

THE LAWYERS REPRESENTING YOU

7. Do I have a lawyer in this case?

In a class action, the Court appoints Class Representatives and lawyers to work on the case and represent the interests of all the Class Members. For this Settlement, the Court has appointed the following individuals and lawyers.

Your lawyer: John J. Nelson of Milberg, PLLC. This is the lawyer who negotiated this Settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

8. How will the lawyers be paid?

Lawyer's fees and costs will be paid from the Settlement Fund. You will not have to pay the lawyer directly.

To date, your lawyer has not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyer will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$200,000 total in attorney fees plus the reimbursement of reasonable out-of-pocket expenses.

Attorney fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the attorney fees even if you think the Settlement terms are otherwise fair.

Your lawyer will also ask the Court to approve a payment of up to \$2,500 to each of the six Class Representatives for the time and effort they contributed to the case. If approved by the Court, this amount will be paid from the Settlement Fund.

YOUR RIGHTS AND OPTIONS

9. What happens if I do nothing at all?

If you do nothing, you will not get any money or credit monitoring services, but you will still be bound by the Settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Crossroads about the issues in this case. A full description of the claims and persons who will be released if this Settlement is approved can be found in the Settlement Agreement available at the Settlement Website, www.CrossroadsSettlement.com.

10. What if I don’t want to be part of this Settlement?

If you do not want to be part of the Settlement, you will not receive payment or credit monitoring and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. You cannot exclude yourself from the program changes called for by the proposed Settlement.

11. How do I opt out?

To opt out of the Settlement, you must send a letter to the Settlement Administrator by September 14, 2026. Your letter must include:

1. The case name and number: *Wright, et al. v. Crossroads Trading Co., Inc.*, No. 25CV479119;
2. Your name, address, telephone number, and the Class Member ID provided on the postcard you received about this Settlement;
3. A statement indicating you want to opt out of the Settlement, such as, “I hereby request to opt out from the proposed Settlement Class in *Wright, et al. v. Crossroads Trading Co., Inc.*, No. 25CV479119”; and
4. Your physical signature.

You must mail your opt-out letter to the address below so it is postmarked by September 14, 2026:

Wright, et al. v. Crossroads Trading Co., Inc.
c/o Kroll Settlement Administration
PO Box 225391
New York, NY 10150-5391
(833) 930-0258

You may only request to opt out on behalf of yourself. Mass or class opt outs will not be accepted.

12. How do I object to the Settlement?

If you disagree with any part of the Settlement (including the lawyer's fees) but don't want to opt out, you may object. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you.

Any Settlement Class Member may object to the adequacy of the Settlement by timely submitting either a written objection to the Court or file a notice of intent to appear, and appear, at the Final Approval Hearing and making an oral objection. Any and all written objections must be postmarked or filed in person prior to the objection deadline and shall:

- (1) Your full name, current mailing address, the Class Member ID provided on the postcard you received about this Settlement, and telephone number;
- (2) Proof that you are a member of the Settlement Class (e.g., a copy of the Settlement Notice or copy of the original Notice of the Data Security Incident);
- (3) The specific factual and legal grounds for your objection;
- (4) Whether your objection applies only to you, a specific subset of the class, or to the entire class;
- (5) All counsel representing you, if any;
- (6) A list, including case name, court, and docket number, of all other cases in which you and/or your counsel has filed an objection to any proposed class action settlement in the past five (5) years;
- (7) A statement regarding whether you (or your counsel) intend to appear at the Final Approval Hearing; and
- (8) Your signature.

You must submit your objection to the Court or submit a notice of intent to appear at the Final Approval Hearing and make an oral objection by mail to the address below. Your objection or notice of intent to appear must be filed or postmarked by **September 14, 2026** to:

Clerk of the Court
Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113

THE COURT'S FINAL APPROVAL HEARING

13. When and where will the Court hold a hearing on the fairness of the Settlement?

The Court will hold a Final Approval Hearing to decide whether to approve the Settlement. The hearing will be held at the Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113 at 1:30 p.m. PT on January 13, 2027.

Class members may appear at the Final Approval Hearing in person or remotely using the link for Department 19 (Afternoon Session), and should review the remote appearance instructions beforehand: <https://santaclara.courts.ca.gov/online-services/remote-hearings>.

Class members who wish to appear remotely are encouraged to contact class counsel at least three days before the hearing, if possible, so that potential technology or audibility issues can be avoided or minimized

The Court has directed the parties to send you this Notice about the proposed Settlement. Because the Settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval of the Settlement before it can take effect. Payments will only be made and credit monitoring will only be issued if the Court approves the Settlement.

14. Do I have to come to the hearing?

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.CrossroadsSettlement.com.

GETTING MORE INFORMATION

15. Where can I get additional information or change my contact information?

This Notice is a summary of the proposed Settlement. The complete Settlement with all its terms can be found in the Settlement Agreement available at the Settlement Website, www.CrossroadsSettlement.com. To get a copy of the Settlement Agreement or get answers to your questions:

Resource	Contact Information
Case website	www.CrossroadsSettlement.com
Settlement Administrator	Kroll Settlement Administration PO Box 225391 New York, NY 10150-5391 (833) 930-0258
Your Lawyer	John J. Nelson Milberg, PLLC jnelson@milberg.com 280 S. Beverly Drive Beverly Hills, CA 90212
Court (DO NOT CONTACT EXCEPT TO SUBMIT AN OBJECTION OR NOTICE OF INTENT TO APPEAR)	Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113

PLEASE DO NOT CALL THE COURT, THE CLERK OF THE COURT, THE JUDGE, OR THE DEFENDANT WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.