

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In the Circuit Court of Cook County, Illinois, Chancery Division
Hall, et al. v. Roseland Community Hospital Association, Case No. 2024CH10367

Were you notified that your Private Information may have been impacted by a Data Incident at Roseland Community Hospital Association on or about June 2, 2024? You may be eligible for benefits from a class action settlement.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Roseland Community Hospital Association (the “Defendant” or “Roseland”) in a class action lawsuit about a data incident that potentially impacted patients’ personally identifiable information (“PII”) and protected health information (“PHI”) (collectively, “Private Information”) which occurred on or about June 2, 2024 (the “Data Incident”). The Plaintiffs allege a claim for negligence. The Defendant denies all claims, allegations, liability and any wrongdoing. The Court has not made a determination that Roseland did anything wrong.
- The Settlement Class consists of all individuals whose Private Information was potentially compromised in the Data Incident and to whom Defendant sent an individual notification that they may have been affected by the Data Incident.
- Under the proposed Settlement, the Defendant will pay \$650,000.00 into a non-reversionary Settlement Fund to resolve the lawsuit. The Settlement Fund will offer the opportunity to claim Cash Payments to Settlement Class Members (a Cash Payment of up to \$5,000.00 for Documented Losses and/or a *Pro Rata* Cash Payment currently estimated to be \$50.00) and one (1) year of Medical Records Monitoring, as well as Settlement Administration Costs, Attorneys’ Fees and Costs, and Service Awards. Cash Payment amounts may be subject to *pro rata* (proportional) adjustment based on the amount of Valid Claims submitted.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive Settlement Class Member Benefits is to submit a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.RoselandSettlement.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.	December 31, 2026
OPT OUT OF THE SETTLEMENT	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant and the Released Parties about the Released Claims resolved by this Settlement. You will not receive any Settlement Class Member Benefits.	December 1, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for Settlement Class Member Benefits.	December 1, 2026
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not get any Settlement Class Member Benefits and you give up the right to sue the Defendant and the Released Parties about the Released 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 must decide whether to approve the Settlement.

Questions? Call (833) 453-3740 or visit www.RoselandSettlement.com

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BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *Hall, et al. v. Roseland Community Hospital Association*, Case No. 2024CH10367 pending in the Circuit Court of Cook County, Illinois, Chancery Division (the “Action”). The people who filed this lawsuit are called the “Plaintiffs” and the company they sued, Roseland Community Hospital Association (“Roseland”), is called the “Defendant.”

2. What is this Action about?

On or about June 2, 2024, Defendant experienced a data incident. Internal and external investigations determined that patients’ personally identifiable information (“PII”) and protected health information (“PHI”) (collectively, “Private Information”) was potentially impacted. This Private Information included names, addresses, date of birth, medical information, insurance information, and for a limited number of individuals, driver’s license numbers or Social Security numbers. On August 1, 2024, Roseland implemented notice on its website about the Data Incident and later mailed written notification letters to individuals whose information may have been impacted. The Plaintiffs allege a claim for negligence. The Defendant denies all the Plaintiffs’ claims, allegations, liability, and maintains that it did not do anything wrong.

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 who sue are known as “Class Representative” or Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Settlement, the Class Representatives are Steven Hall, individually and on behalf of his minor children, S.H., S.D.H., and L.H., Diamond Davis, and Chantel Carmickle.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that they have not violated any laws. The Plaintiffs and Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim a Cash Payment and/or Medical Records Monitoring. The Plaintiffs and their attorneys, who also represent Settlement Class Members as “Class Counsel,” believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals whose Private Information was potentially compromised in the Data Incident and to whom Defendant sent an individual notification that they may have been affected by the Data Incident.

6. Are there exceptions to being included?

Yes, excluded from the Settlement Class are (a) all persons who are directors, officers, and agents of Defendant and any entity in which Defendant or its parents have a controlling interest; (b) governmental entities; (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; (d) all Settlement Class Members who timely and validly opt out of the Settlement Class; and (e) any 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.

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THE SETTLEMENT CLASS MEMBER BENEFITS

7. What does the Settlement provide?

If approved by the Court, the Defendant will pay \$650,000.00 into a Settlement Fund to resolve the lawsuit. The Settlement Fund will provide benefits to Settlement Class Members as well as Settlement Administration Costs, Attorneys' Fees and Costs, and Service Awards.

Settlement Class Members may submit a Claim Form to receive the following Settlement Class Member Benefits:

- **Medical Records Monitoring:** One (1) year of Medical Records Monitoring; AND
- **Cash Payment A – Documented Losses:** Cash Payment of up to \$5,000.00 for Documented Losses and expenses incurred as a result of the Data Incident; AND
- **Cash Payment B – *Pro Rata* Cash Payment:** A *pro rata* (proportional) Cash Payment, estimated to be \$50.00.

Note: Based on the total amount of Valid Claims, Cash Payment amounts may be adjusted *pro rata* (proportionally).

8. Tell me more about Cash Payment A - Documented Losses.

You may submit a Claim for a cash payment of up to \$5,000.00 (per Settlement Class Member) of unreimbursed Documented Losses related to the Data Incident. To receive a Cash Payment for Documented Losses, you must elect Cash Payment A on the Claim Form, provide reasonable documentation supporting the losses, and attest under penalty of perjury to having incurred documented losses.

Documented losses may include, without limitation, 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 fairly traceable to the Data Incident; and miscellaneous expenses such as notary, facsimile, postage, copying, mileage, and long-distance telephone charges. You will not be reimbursed for expenses if you have been reimbursed for the same expenses by another source.

Reasonable documentation is third-party documentation such as receipts, invoices, credit card statements, phone bills, or other documentation not "self-prepared" that demonstrates 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.

If you do not submit reasonable documentation supporting a loss, or if your Claim for Cash Payment A – Documented Losses is rejected by the Settlement Administrator for any reason, and you fail to cure the Claim, your Document Losses Claim will be converted to a Cash Payment B – *Pro Rata* Cash Claim.

The payment amount may be adjusted on a *pro rata* (proportional) basis (see Question 11).

9. Tell me more about Cash Payment B – *Pro Rata* Cash.

In addition to Cash Payment A - Documented Losses, Settlement Class Members may submit a Claim for Cash Payment B – *Pro Rata* Cash. The amount of Cash Payment B is estimated to be \$50.00, but the payment amount may be adjusted on a *pro rata* (proportional) basis (see Question 11). No supporting documentation is required to file a Claim for Cash Payment B.

10. Tell me more about the Medical Records Monitoring.

In addition to the Cash Payment options above, you may also choose to receive a code to activate one (1) year of Medical Records Monitoring through CyEx's Medical Shield Complete, or its equivalent. The Medical Records Monitoring will include up to \$1,000,000.00 of identity theft insurance coverage. This benefit will be available regardless of whether you previously received a credit monitoring product related to the Data Incident or otherwise.

Once the Settlement receives Final Approval from the Court and becomes effective (see Question 14), Settlement Class Members who submitted a Valid Claim will receive an activation code no later than 45

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days after the Effective Date. The activation code may then be used to enroll in the Medical Shield Complete product. If you did not receive an activation code or need assistance, please contact the Settlement Administrator at (833) 453-3740 or by using the “Contact Us” button on the Settlement Website www.RoselandSettlement.com.

11. How will payment amounts be calculated?

After deducting taxes and Court-approved Settlement Administration Costs, Attorneys’ Fees and Costs, and Service Awards, the remaining balance of the Settlement Fund (“Net Settlement Fund”) will be used to pay the costs of Valid Claims for benefits to Settlement Class Members in the following order: (i) Medical Records Monitoring, (ii) Cash Payment A - Documented Losses, and (iii) Cash Payment B – *Pro Rata* Cash.

Once the costs of Valid Claims for Medical Records Monitoring and Cash Payment A - Documented Losses have been determined, any remaining balance will be used to provide Settlement Class Members with Valid Claims for Cash Payment B with a *pro rata* (proportional) share of that balance.

Based on the total amount of Valid Claims, Cash Payment amounts may be adjusted *pro rata* (proportionally). Any *pro rata* increases or decreases to Cash Payments will be on an equal percentage basis designed to exhaust the Settlement Fund. Any remaining balance after taxes, costs, fees, awards, and Claims have been paid, will be distributed to a non-profit organization approved by the Court. A detailed description of how payments will be calculated and benefits distributed is provided in the Settlement Agreement available at www.RoselandSettlement.com.

12. What claims am I releasing if I stay in the Settlement?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant or any of the Released Parties about any of the Released Claims this Settlement resolves. The Releases section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.RoselandSettlement.com.

HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS – MAKING A CLAIM

13. How do I submit a Claim Form to get Settlement Class Member Benefits?

To receive benefits under the Settlement, you must submit a Claim Form online at www.RoselandSettlement.com by 11:59 p.m. **December 31, 2026**, or by mail, postmarked by **December 31, 2026**, to the Settlement Administrator at:

Hall, et al. v. Roseland Community Hospital Association
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

14. When will I get Settlement Class Member Benefits?

The short answer is – after the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **January 6, 2027**, to decide whether to approve the Settlement, attorneys’ fees and costs for Class Counsel, and Service Awards for the Class Representatives.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Cash Payments will be distributed to Settlement Class Members and Medical Records Monitoring available as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court appointed Gary M. Klinger of Milberg, PLLC, J. Gerard Stranch, IV of Stranch, Jennings & Garvey, PLLC and William B. Federman of Federman & Sherwood to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

16. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees up to one-third of the Settlement Fund (\$216,666.67) plus unreimbursed litigation expenses up to \$20,000.00, as well as a \$2,500.00 Service Award to each of the Class Representatives. If approved, these amounts will be paid from the Settlement Fund before providing benefits to Settlement Class Members who submit Valid Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

18. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant or the Released Parties about the legal issues in this case, you must take steps to exclude yourself from the Settlement. This is called "opting out" of the Settlement Class.

To exclude yourself from the Settlement, you must submit a written request to opt out to the Settlement Administrator that includes the following information:

- A statement that you wish to opt out of the Settlement in *Hall, et al. v. Roseland Community Hospital Association*, Case No. 2024CH10367, Circuit Court of Cook County, Illinois, Chancery Division;
- Your full name, address, telephone number, and email address; and
- Your personal signature.

Your request to opt out must be mailed to the Settlement Administrator at the address below, postmarked no later than **December 1, 2026**.

Hall, et al. v. Roseland Community Hospital Association
c/o Kroll Settlement Administration LLC
ATTN: Request to Opt Out
P.O. Box 225391
New York, NY 10150-5391

You cannot opt out by telephone or by email.

"Mass" or "class" requests for exclusion filed by third parties on behalf of a "mass" or "class" of Settlement Class Members or multiple Settlement Class Members where the opt out has not been signed by each and every individual Settlement Class Member will not be allowed.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request

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for attorneys' fees and costs, the Service Awards, the Releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

To be considered by the Court, your objection must include:

- The case name and number, *Hall, et al. v. Roseland Community Hospital Association*, Case No. 2024CH10367, Circuit Court of Cook County, Illinois, Chancery Division;
- Your full name, mailing address, telephone number, and email address (if any);
- Documentation sufficient to establish membership in the Settlement Class, such as a copy of the Postcard Notice or Long Form Notice you received;
- All grounds for the objection, accompanied by any legal support for the objection known to you or your attorney;
- The number of times you have objected to a class action settlement within the five (5) years preceding the date of this objection, the caption of each case in which you have objected, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- The identity of all attorney(s) who represent you, including any former or current attorney(s) who may be entitled to compensation for any reason related to your objection to this Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;
- The number of times in which your attorney(s) or their firm has objected to a class action settlement within the five (5) years preceding the date this objection, the caption of each case in which they objected and a copy of any orders related to or ruling upon their prior objections that were issued by the trial and appellate courts in each listed case;
- The identity of the attorney(s) and whether they will appear at the Final Approval Hearing;
- A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- Your signature (an attorney's signature is not sufficient).

Objections must be filed with, or mailed to, the Court no later than **December 1, 2026**.

Circuit Court of Cook County
Daley Center
50 W. Washington St.
Chicago, IL 60602

A copy of your objection also must be sent to Class Counsel, Defendant's Counsel, and the Settlement Administrator, with a postmark or shipping date no later than **December 1, 2026**, at the following addresses:

CLASS COUNSEL	DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Gary M. Klinger Milberg, PLLC 227 W. Monroe Street Suite 2100 Chicago, IL 60606 J. Gerard Stranch, IV Stranch, Jennings & Garvey, PLLC 223 Rosa L. Parks Avenue Suite 200 Nashville, TN 37203 William Federman Federman & Sherwood 10205 N. Pennsylvania Avenue Oklahoma City, OK 73120	Casie D. Collignon Baker & Hostetler LLP 1801 California Street Suite 4400 Denver, CO 80202	<i>Hall, et al. v. Roseland Community Hospital Association</i> c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box 225391 New York, NY 10150-5391

20. What is the difference between objecting and opting out?

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 it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

21. When is the Court's Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **January 6, 2027, at 9:30 a.m. CT**, at Room 2601, Daley Center, 50 W. Washington St., Chicago, IL 60602, to decide whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses up to one-third of the Settlement Fund (\$216,666.67) plus unreimbursed litigation expenses up to \$20,000.00, and a \$2,500.00 Service Award to each of the Settlement Class Representatives who brought this Action on behalf of the Settlement Class. The hearing may also be held remotely. The date and time of this hearing may change without further notice. Please check www.RoselandSettlement.com for updates.

22. 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 file an objection, you may come to the Final Approval Hearing to talk about it, but it is not required. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant or the Released Parties, as defined in the Settlement Agreement, about the Released Claims resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement and will not be eligible to receive any Settlement Class Member Benefits.

GETTING MORE INFORMATION

24. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.RoselandSettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by telephone at (833) 453-3740, or by mail at:

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New York, NY 10150-5391