

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Richard Teague v. AGC America, Inc.

Case No. 1:24-cv-00823-VMC

United States District Court for the Northern District of Georgia

IF YOU RECEIVED NOTICE OF THE DECEMBER 2023 AGC AMERICA, INC. INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO SETTLEMENT CLASS MEMBER 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 AGC America, Inc. (“AGC” or “Defendant”) in a class action lawsuit. This case is related to the December 2023 targeted cyberattack in which a third party gained unauthorized access to certain of AGC’s systems and may have accessed individuals’ information (the “Incident”). These files may have contained personal information such as names, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information associated with direct deposits, passports, payment card numbers; company network login credentials, or limited health insurance plan enrollment information for current and former health insurance plan participants.
- The lawsuit is called *Richard Teague v. AGC America, Inc.*, Case No. 1:24-cv-00823-VMC. It is pending in the United States District Court for the Northern District of Georgia (the “Litigation”).
- AGC denies any liability or wrongdoing, 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.
- If you were sent notice of the Incident indicating that your private information may have been impacted by the Incident, then you are a Settlement Class Member.
- 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 Settlement Class Member Benefits 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.AGCSettlement.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>	July 15, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no Settlement Class Member Benefit. This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendant or Released Parties related to the Released Claims resolved by this Settlement. You can hire your own lawyer at your own expense.	June 15, 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 will remain a Settlement Class Member, and you may also file a claim for Settlement Class Member Benefits.	June 15, 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 Settlement Class Member Benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to 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 has to decide whether to approve the Settlement.

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Basic Information

1. Why was this Notice issued?

The United States District Court for the Northern District of Georgia 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 *Richard Teague v. AGC America, Inc.*, Case No. 1:24-cv-00823-VMC. It is pending in the United States District Court for the Northern District of Georgia. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, AGC America, Inc., is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the December 2023 targeted cyberattack in which a third party gained unauthorized access to certain of AGC’s computer systems and may have accessed individuals’ information. These files may have contained personal information such as names, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information associated with direct deposits, passports, payment card numbers, company network login credentials, or limited health insurance plan enrollment information for current and former health insurance plan participants.

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 of the Settlement. In this Settlement, the Class Representative is Richard Teague. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant are right. Both sides have agreed to a Settlement after a lengthy mediation process overseen by a neutral mediator. Settlement avoids the costs

and risks of a trial, and allows the Settlement Class Members to receive benefits from the Settlement. The Plaintiff and their attorneys 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 this way: “All living individuals residing in the United States who were sent a notice of the Incident indicating their Private Information may have been impacted in the Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all persons who are directors of AGC, or its respective subsidiaries and affiliated companies, and any entity in which AGC has a controlling interest; (2) governmental entities; (3) the Judge in this case, and the Judge’s family and Court staff; (4) anyone who validly excludes themselves from the Settlement; and (5) anyone who perpetrated the 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@AGCSettlement.com
- Call toll free, 24/7: 1-833-386-6480
- By mail: AGC Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Class Member Benefits

7. What does the Settlement provide?

AGC will make a non-reversionary payment of \$597,000.00 into an escrow account to establish the Settlement Fund. The Settlement Fund will be used to pay Settlement Administration Costs; Service Award approved by the Court; Attorneys’ Fees and Expenses approved by the Court; and Settlement Class Member Benefits as provided in the Settlement Agreement. A description of these commitments is available in the Settlement Agreement, which is available at www.AGCSettlement.com.

CASH BENEFIT OPTIONS

Option A – Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Incident, you can submit a claim for up to **\$2,500.00**. The losses must have occurred between December 14, 2023, and July 15, 2026.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- 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 bank statements or 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 Incident.

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

Option B – Alternative Cash Payment. *Instead of the benefits in Option A*, you may make a claim for a one-time cash payment. This payment is estimated to be **\$50.00**, but may be larger or smaller depending on the total number of Valid Claims.

You do not have to provide any proof or explanation to make a claim this Alternative Cash Payment.

CREDIT MONITORING AND INSURANCE SERVICES. All Settlement Class Members are eligible to enroll in two years of CyEx Financial Shield Complete. This comprehensive service comes with \$1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

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

- Email: info@AGCSettlement.com
- Call toll free, 24/7: 1-833-386-6480
- By mail: AGC Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

8. What claims am I releasing if I stay in the Class?

If you make a claim under the Settlement, object to the Settlement, or do nothing, you will be releasing all of your legal claims relating to the Incident against Defendant when the Settlement becomes final. By releasing your legal claims, you are giving up the right to file, or to continue to pursue, separate legal claims against or seek further compensation from Defendant or the Released Parties for the Released Claims—whether or not you are currently aware of those claims. The “Releases” section of the Settlement Agreement (Section XIII) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.AGCSettlement.com.

Submitting a Claim Form for Settlement Class Member Benefits

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.AGCSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

AGC 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, 1-833-386-6480, by email info@AGCSettlement.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 **July 15, 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 **July 15, 2026**.

11. When will the Settlement Class Member Benefits be issued?

The Court will hold a Final Approval Hearing on **July 21, 2026** at 10:30 AM (**see Question 18**). 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 MaryBeth V. Gibson of Gibson Consumer Law Group, LLC and John J. Nelson of Milberg Coleman Bryson Philips Grossman, 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 up to one-third of the Settlement Fund as reasonable Attorneys’ Fees and Expenses. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for a Service Award of \$2,500.00 for the Class Representative. The Service Award 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 Class Member Benefits or payment. However, you will keep any rights you may have to sue,

continue to sue, or be part of another lawsuit against AGC or the Released Parties on your own about the Released Claims.

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 Class Member Benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **June 15, 2026**.

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

- (1) the name of the Litigation: *Richard Teague v. AGC America, Inc.*, Case No. 1:24-cv-00823-VMC, pending in the United States District Court for the Northern District of Georgia;
- (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:

AGC Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **June 15, 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) your full name, mailing address, telephone number, and email address;
- (2) the name of the Litigation: *Richard Teague v. AGC America, Inc.*, Case No. 1:24-cv-00823-VMC, pending in the United States District Court for the Northern District of Georgia;
- (3) documentation that proves that you are a Settlement Class Member (such as a notice you have received);
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;

- (6) if you or your lawyer have objected in any other cases in the past five years, list the names, courts, the orders ruling on your objections, and civil action numbers for each of those cases;
- (7) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;
- (8) whether or not you or your lawyer would like to speak at the Final Approval Hearing; and
- (9) your signature (if you have hired your own lawyer, their signature is not sufficient).

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 **June 15, 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
Clerk of the Court 75 Ted Turner Drive SW Atlanta Georgia 30303-3309	AGC Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958
Class Counsel	Counsel for Defendants
MaryBeth V. Gibson Gibson Consumer Law Group, LLC 4279 Roswell Road, Suite 208-108 Atlanta, GA 30342	Lisa A. Houssiere Baker & Hostetler LLP 811 Main Street, Suite 1100 Houston, TX 77002
John J. Nelson Milberg Coleman Bryson Phillips Grossman, PLLC 280 S. Beverly Drive Beverly Hills, CA 90212	Chelsea M. Lamb Baker & Hostetler LLP 1170 Peachtree Street, Suite 2400 Atlanta, GA 30309

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 **July 21, 2026 at 10:30 a.m. Eastern Time**, in Room 2105 of the United States District Court for the Northern District of Georgia, at 75 Ted Turner Drive SW, Atlanta, Georgia 30303-3309.

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 a Service Award to the Settlement Class Representative. The Court will also consider any objections to the Settlement.

If you are a Settlement 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.AGCSettlement.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.AGCSettlement.com.

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

- Email: info@AGCSettlement.com
- Call toll free, 24/7: 1-833-386-6480
- By mail: AGC 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, 75 Ted Turner Drive SW Atlanta, Georgia 30303-3309.

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