

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Batin et al. v. Akeela, Inc.
Case No. 3AN-25-07526-CI
Superior Court for Anchorage, Alaska

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE JUNE 2023
AKEELA, INC., DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT
MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS AND A
CASH PAYMENT.**

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 Akeela, Inc. (“Akeela” or “Defendant”) in a class action lawsuit. This case is about a cybersecurity incident that Akeela discovered in June 2023 (the “Data Incident”). Certain files that contained Private Information were potentially accessed that may have contained personal information such as Social Security numbers, dates of birth, and medical diagnosis and treatment information.
- The lawsuit is called *Batin et al. v. Akeela, Inc.*, Case No. 3AN-25-07526-CI. It is pending in the Superior Court for Anchorage, Alaska (the “Litigation”).
- Akeela denies that it 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.
- Akeela's records indicate that you are a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Akeela.
- 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.AkeelaSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.</p>	May 25, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment or Credit Monitoring. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	April 24, 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 Class Member benefits.	April 24, 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. You will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved and released 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 Superior Court for Anchorage, Alaska, 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 *Batin et al. v. Akeela, Inc.*, Case No. 3AN-25-07526-CI. It is pending in the Superior Court for Anchorage, Alaska. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Akeela, Inc., is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the June 2023 cybersecurity incident involving Akeela's computer systems, certain files may have been accessed by unauthorized third parties. These files may have contained personal information such as Social Security numbers, dates of birth, and medical diagnosis and treatment 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 proposed Settlement, the Class Representatives are Jessica McRorie; Elynnie Batin; Jane Doe; Rocky Hawley; Andrew Metcalf; Thomas Maxim; and Kathleet Yarr as Personal Representative for the Estate of Ian Christiansen. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive

benefits from the Settlement. The Plaintiffs 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 Settlement Class this way: “All U.S. residents whose Personal Information was compromised in the Data Incident discovered by Defendant on or about June 22, 2023.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) Akeela, and its officers and directors; (2) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (3) the presiding judge, and his or her staff and family; and (4) 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 Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@AkeelaSettlement.com
- Call toll free, 24/7: 1-833-647-9067
- By mail: Akeela 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.AkeelaSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Akeela has agreed to establish a \$50,000.00 Settlement fund to provide the benefits listed below. Other costs, such attorneys fees and costs, will be paid separately by Akeela.

BENEFITS

Identity Theft Protection and Credit Monitoring. All Settlement Class Members are eligible to enroll in two years of CyEx Financial Shield. This comprehensive service 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.

Pro Rata Cash Payment. All Settlement Class Members are also eligible to claim a Pro Rata Cash Payment. The payment amount will be calculated by dividing the Settlement Fund by the number of valid and timely claims.

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

- Email: info@AkeelaSettlement.com
- Call toll free, 24/7: 1-833-647-9067
- By mail: Akeela Data Incident Settlement
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P.O. Box 25226
Santa Ana, CA 92799-9958

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

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against Akeela about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section VIII) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.AkeelaSettlement.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.AkeelaSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Akeela 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, 1-833-647-9067, by email info@AkeelaSettlement.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 **May 25, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than **May 25, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on **April 13, 2026 (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.

Please be patient.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Gary M. Klinger of Milberg, Coleman, Bryson, Phillips, Grossman, PLLC; and Jeff Ostrow of Kopelowitz Ostrow Ferguson Weiselberg Gilbert, to represent you and other Settlement 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 \$200,000.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by Akeela.

Class Counsel will also ask for Service Award Payments of \$1,000.00 for each of the Class Representatives. Service Award Payments will also be paid by Akeela.

Opting-Out 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 an Opt-Out Request.

If you opt-out, 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 opt-out. However, you will keep any rights you may have to sue Akeela on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **April 24, 2026**.

To be valid, your Opt-Out Request must have the following information:

- (1) the name of the Litigation: *Batin et al. v. Akeela, Inc.*, Case No. 3AN-25-07526-CI, pending in the Superior Court for Anchorage, Alaska;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Opt-Out Request” 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:

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

Your Opt-Out Request must be submitted and postmarked by **April 24, 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 Settlement 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 opted-out 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: *Batin et al. v. Akeela, Inc.*, Case No. 3AN-25-07526-CI, pending in the Superior Court for Anchorage, Alaska;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) a written statement of the specific grounds for the objection, as well as any legal basis and documents supporting the objection;
- (4) a written statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class;
- (5) the identity of any and all attorneys representing the objector;
- (6) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; and
- (7) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

For your objection to be considered, 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 **April 24, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 825 W 4 th Ave Anchorage, Alaska 99501	Akeela Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

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 opt-out from the Settlement. Opting out from the Settlement is 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 **April 13, 2026 at 3:00 p.m. Alaska Time**, in Room 604 of the Superior Court for Anchorage, Alaska, at 825 W 4th Ave, Anchorage, Alaska 99501.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award Payment to the Class Representatives. The Court will also consider any timely 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.AkeelaSettlement.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.AkeelaSettlement.com.

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

- Email: info@AkeelaSettlement.com
- Call toll free, 24/7: 1-833-647-9067
- By mail: Akeela 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, 825 W 4th Ave, Anchorage, Alaska 99501.

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