

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Bogdan v. Abbott Laboratories Employees Credit Union

Case No. 2026CH000033

Circuit Court of McHenry County, Illinois

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE AUGUST 2024 ABBOTT LABORATORIES EMPLOYEES CREDIT UNION 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 Abbott Laboratories Employees Credit Union (“ALEC” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on ALEC’s computer systems that occurred in August 2024 (the “Data Incident”). Certain files that contained private information were accessed. These files may have contained personal information such as names; financial account information; and Social Security numbers.
- The lawsuit is called *Laura Bogdan, Marissa Foresta, Lakeena Thompson, Sonia J. Perez, Kelly Monastiriakos, Lloyd Garcia, Karla Garcia, Sharita Medina, and John Williams v. Abbott Laboratories Employees Credit Union*, Case No. 2026CH000033. It is pending in the Circuit Court of McHenry County, Illinois (the “Litigation”).
- ALEC 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.
- ALEC’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 ALEC.
- 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 Cash 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.ALECDDataSettlement.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>	September 3, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or payment. This option allows you to sue, continue to sue, or be part of another lawsuit against Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	August 4, 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 benefits.	August 4, 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 and 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 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.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
WHO IS IN THE SETTLEMENT	4
THE SETTLEMENT BENEFITS.....	4
SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS	5
THE LAWYERS REPRESENTING YOU	6
EXCLUDING YOURSELF FROM THE SETTLEMENT	6
COMMENTING ON OR OBJECTING TO THE SETTLEMENT.....	7
THE COURT’S FINAL APPROVAL HEARING	8
IF I DO NOTHING	9
GETTING MORE INFORMATION	9

Basic Information

1. Why was this Notice issued?

The Circuit Court of McHenry County, Illinois, 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 *Laura Bogdan, Marissa Foresta, Lakeena Thompson, Sonia J. Perez, Kelly Monastiriakos, Lloyd Garcia, Karla Garcia, Sharita Medina, and John Williams v. Abbott Laboratories Employees Credit Union*, Case No. 2026CH000033. It is pending in the Circuit Court of McHenry County, Illinois. The people that filed this lawsuit are called the “Plaintiffs” (or “Settlement Class Representatives”) and the company they sued, Abbott Laboratories Employees Credit Union, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that there was an August 2024 targeted cyberattack on ALEC’s computer systems and certain files that contained private information were accessed. These files may have contained personal information such as names; financial account information; and Social Security numbers.

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 Settlement, the Settlement Class Representatives are Laura Bogdan; Marissa Foresta; Lakeena Thompson; Sonia J. Perez; Kelly Monastiriakos; Lloyd Garcia; Karla Garcia; Sharita Medina; and John Williams. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether Plaintiffs or 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. 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 individuals residing in the United States who were sent a Breach Notice stating that their Personal Information was potentially compromised in the Data Incident discovered by ALEC on or about August 2, 2024.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the judges presiding over this Action, and members of their direct families; (2) Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which Defendant or its parents have a controlling interest; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

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@ALECDataSettlement.com
- Call toll free, 24/7: 1-(833) 421-7235
- By mail: ALEC 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.ALECDataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

ALEC has agreed to pay for a number of different benefits. Settlement Class Members have been sent an enrollment code for **Financial Monitoring Services** and may claim one or more **cash payment** options. The benefits are explained in more detail below.

FINANCIAL MONITORING SERVICES. All Settlement Class Members are eligible to enroll in two years of CyEx Financial Shield Pro if the Settlement is finally approved. 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.

You will be able to activate the code for Financial Monitoring Services within 180 days after the Effective Date of the Settlement.

CASH PAYMENT OPTIONS

Reimbursement for Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$2,500.00**. The losses must have occurred between August 2, 2024, and September 3, 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 Data Incident.

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

Pro Rata Cash Payment. You may also claim a one-time cash payment. Defendant has agreed to pay \$150,000 total for these claims. This amount will be divided equally between everyone who submits a valid claim. You do not have to provide any proof or explanation to claim this payment.

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

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

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

ALEC 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) 421-7235, by email info@ALECDataSettlement.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 **September 3, 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 **September 3, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **September 18, 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.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Ben Barnow of Barnow and Associates P.C.; Jason S. Rathod of Migliaccio & Rathod LLP; and Gary M. Klinger of Milberg PLLC, to represent you and other Settlement Class Members (“Settlement Class Counsel”).

13. Should I get my own lawyer?

You will not be charged for Settlement Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

14. How will Settlement Class Counsel be paid?

Settlement Class Counsel will ask the court to approve \$250,000.00 as reasonable attorneys’ fees and costs of litigation. This amount will be paid by ALEC.

Settlement Class Counsel will also ask for Service Award payments of \$2,000.00 for each of the Settlement Class Representatives. Service Award payments will also be paid by ALEC.

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 benefits or payment. However, you will keep any rights you may have to sue ALEC on your own about the legal issues in this case.

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 benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **August 4, 2026**.

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

- (1) the name of the Litigation: *Laura Bogdan, Marissa Foresta, Lakeena Thompson, Sonia J. Perez, Kelly Monastiriakos, Lloyd Garcia, Karla Garcia, Sharita Medina, and John Williams v. Abbott Laboratories Employees Credit Union*, Case No. 2026CH000033, pending in the Circuit Court of McHenry County, Illinois;
- (2) your full name and mailing 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.

Email your Request for Exclusion to the Settlement Administrator at info@ALECDataSettlement.com. Mail your Request for Exclusion to the Settlement Administrator at:

ALEC Data 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 **August 4, 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 excluded yourself 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: *Laura Bogdan, Marissa Foresta, Lakeena Thompson, Sonia J. Perez, Kelly Monastiriakos, Lloyd Garcia, Karla Garcia, Sharita Medina, and John Williams v. Abbott Laboratories Employees Credit Union*, Case No. 2026CH000033, pending in the Circuit Court of McHenry County, Illinois;
- (2) your full name, mailing address, and telephone number;

- (3) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (4) whether the objection applies only to you, or to other Settlement Class Members, as well;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (6) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (7) if you or your lawyer have objected in any other cases, list the names, courts, and civil action numbers for each of those cases; and
- (9) your signature (or, if you have hired your own lawyer, your lawyer’s signature).

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 **August 4, 2026**. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 2200 N. Seminary Ave, Woodstock, IL 60098	ALEC 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 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 on **September 18, 2026 at 9:00 a.m. Central Time**, in Room 357 of the Circuit Court of McHenry County, Illinois, at 2200 N. Seminary Ave., Woodstock, IL 60098.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Settlement Class Counsel should be paid, and whether to award Service Award payments to the Settlement Class Representatives. 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.ALECDDataSettlement.com for updates.

19. Do I have to come to the Final Approval Hearing?

No. Settlement 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 7**.

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.ALECDDataSettlement.com.

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

- Email: info@ALECDDataSettlement.com
- Call toll free, 24/7: 1-(833) 421-7235
- By mail: ALEC 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, 2200 N. Seminary Ave, Woodstock, IL 60098.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING QUESTIONS ABOUT SETTLEMENT ADMINISTRATION, BUT YOU MAY FILE OBJECTIONS WITH THE CLERK OF COURT