

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Robert Alejnikov et al. v. WaterStreet Company

Case No. CACE-26-005928

The 17th Judicial Circuit for Broward County, Florida

IF YOUR PRIVATE INFORMATION WAS POTENTIALLY IMPACTED IN THE MARCH 2025 DATA INCIDENT EXPERIENCED BY WATERSTREET COMPANY , A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND YOU MAY BE ENTITLED TO BENEFITS

The 17th Judicial Circuit for Broward County, Florida 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 proposed Settlement has been reached with WaterStreet Company (“WaterStreet” or “Defendant”) in a class action lawsuit arising out of a cyber incident that resulted in unauthorized access to certain files that contained Private Information on March 17, 2025 (the “Data Incident”). The Private Information potentially impacted includes names along with one or more of the following: taxpayer identification number, bank account information and/or Social Security numbers.
- The lawsuit is called *Robert Alejnikov et al. v. WaterStreet Company*, Case No. CACE-26-005928. It is pending in the 17th Judicial Circuit for Broward County, Florida (the “Litigation”).
- WaterStreet 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.
- WaterStreet'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 WaterStreet.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely, but further details are available in the Settlement Agreement, which can be found online at www.WaterstreetSettlement.com.***

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.WaterstreetSettlement.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 the Settlement Administrator to receive a paper copy of the Claim Form.</p>	August 19, 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 WaterStreet 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 the Settlement Class Member 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 WaterStreet 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. No Settlement Class Member Benefits will be provided unless the Court approves the Settlement, and it becomes final.
- All capitalized terms in this Notice are defined in the Settlement Agreement, including Section II. You can view the Settlement Agreement at **www.WaterstreetSettlement.com**.

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Basic Information

1. Why was this Notice issued?

The 17th Judicial Circuit for Broward County, Florida authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your rights and options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who can receive the benefits, and how to receive those benefits.

The lawsuit is called *Robert Alejnikov et al. v. WaterStreet Company*, Case No. CACE-26-005928. It is pending in the 17th Judicial Circuit for Broward County, Florida. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, WaterStreet Company, is called the “Defendant.”

2. What is this lawsuit about?

On March 17, 2025, WaterStreet discovered suspicious activity related to its network environment. In response, WaterStreet promptly launched an investigation to confirm the nature and scope of the activity. The investigation revealed that an unauthorized actor accessed certain files on March 17, 2025 (the “Data Incident”). WaterStreet then conducted a thorough review of the files and identified the potential access to personal information such as name, Social Security numbers, bank account information, and taxpayer identification number.

On April 9, 2026, Plaintiffs filed a class action Complaint against WaterStreet in the Circuit Court of the 17th Judicial Circuit in and for Broward County, Florida, alleging negligence, breach of implied contract, and unjust enrichment, in relation to the Data Incident.

WaterStreet does not in any way acknowledge, admit to, or concede any of the allegations made in the Complaint, and expressly disclaims and denies any fault or liability, or any charges of wrongdoing that have been or could have been asserted in the Complaint. Visit www.WaterstreetSettlement.com to view the Complaint.

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 “Settlement 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 Robert Alejnikov and Daniel Baldwin. Everyone included in this Action are members of the Settlement Class.

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 members of the Settlement Class to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all members of the Settlement Class.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Settlement Class this way: “All living individuals residing in the United States who were sent a notice of the Data Incident indicating their Private Information may have been impacted in the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all persons who are directors, officers, and agents of WaterStreet, or its respective subsidiaries and affiliated companies; (2) governmental entities; (3) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and (4) any Settlement Class Member who timely opt-outs of the Settlement Class as instructed in the Settlement Agreement; (5) the attorneys representing the Plaintiffs and WaterStreet in the lawsuit; and (6) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting 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@WaterstreetSettlement.com
- Call toll free, 24/7: 1- (833) 421-7237
- By mail: WaterStreet 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.WaterstreetSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

All members of the Settlement Class may claim **Credit Monitoring** and one of the two **Cash Payment** options. There is a cap of \$500,000 on Cash Payments. This means that if the total value of benefits claimed is over \$500,000, everyone's payments will be reduced *pro rata* so that they add up to \$500,000. The benefits are explained in more detail below.

CREDIT MONITORING. All members of the Settlement Class are eligible to enroll in three years of CyEx Financial Shield Complete. Enrollment codes will be sent either via email or by a Postcard mailed to you. Visit <http://app.financialshield.com/enrollment/activate/waterstreet> to enroll. Your CyEx Financial Shield Complete subscription will become active once the Court grants Final Approval to this Settlement (*i.e.* approves the Settlement).

If you no longer have your enrollment code, please contact the Settlement Administrator.

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.

CASH PAYMENTS. You may claim only one payment from the two options.

Cash Payment A – Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$3,000.00**. The losses must have occurred between March 17, 2025, and **August 19, 2026**. You must have also made reasonable efforts to avoid, or seek reimbursement for, the loss.

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 third-party 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 should show that your expenses were because of the Data Incident or more likely than not caused by the Data Incident.

Again, personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but may be used to provide clarification, context, or

support for other reasonable documentation.

You cannot claim a payment for expenses that have already been reimbursed by a third party. This includes reimbursement in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by WaterStreet or otherwise. There will also be no payments for emotional distress, personal/bodily injury, or to punish WaterStreet.

This payment may be smaller depending on the total claims filed.

-OR-

Cash Payment B – Alternate Cash. Instead of *Cash Payment A*, you may claim a one-time cash payment. This payment is expected to be **\$55.00**, but may be smaller depending on the total claims filed. 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:

- Email: info@WaterstreetSettlement.com
- Call toll free, 24/7: 1- (833) 421-7237
- By mail: WaterStreet Data 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 Settlement Class?

If you stay in the Settlement Class and do not opt-out, you will not be able to be part of any other lawsuit against WaterStreet (and the Released Parties) or separately file a lawsuit about the issues that this Settlement covers. The “Releases” section of the Settlement Agreement (Section XI) describes the legal claims that you are giving up and against whom, if you remain in the Settlement Class. The Settlement Agreement is available at www.WaterstreetSettlement.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.WaterstreetSettlement.com. All submissions for Cash Payment A – Documented Losses, must be submitted online at www.WaterstreetSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

WaterStreet 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) 421-7237, by email info@WaterstreetSettlement.com, or by U.S. mail at the address above.

For more information about the Claim Process, please review Section VIII of the Settlement Agreement. The Settlement Agreement is available at www.WaterstreetSettlement.com.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **August 19, 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 **August 19, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on **September 3, 2026 at 8:45am ET (see Question 18 for more information about the Final Approval Hearing)**. If the Court approves the Settlement, then Settlement payments will be distributed for all Valid Claims filed by **August 19, 2026**. More information about this process can be found in the Settlement Agreement (Section VIII). The Settlement Agreement is available at www.WaterstreetSettlement.com.

Settlement payments cannot be distributed if there are any appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

So Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved. Please be patient and check www.WaterstreetSettlement.com for updates.

It is your responsibility to inform the Settlement Administrator of any updates to your information after the submission of your Claim Form.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Jeff Ostrow of Kopelowitz Ostrow P.A.; Mariya Weekes of Milberg LLC; Rachel Dapeer of Dapeer Law, P.A.; and Manuel Hiraldo of Hiraldo Law P.A. (“Class Counsel”), to represent you and other members of the Settlement Class.

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 \$282,500.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by WaterStreet and is separate from WaterStreet’s payment of the Settlement Administration Costs and the Settlement Class Member Benefits.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments will also be paid by WaterStreet and separately from WaterStreet's payment of the Settlement Administration Costs and the Settlement Class Member Benefits.

The Court may award less than these amounts.

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 or bound by the Agreement, 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 or payment, if you opt-out. However, you will keep any rights you may have to sue WaterStreet (and the Released Parties) on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **August 4, 2026**.

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

- (1) the name of the Litigation: *Robert Alejnikov et al. v. WaterStreet Company*, Case No. CACE-26-005928, pending in the 17th Judicial Circuit for Broward County, Florida;
- (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 or a group of persons.

Mail your Request for Exclusion to the Settlement Administrator at:

WaterStreet 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 **August 4, 2026**.

More information about this process can be found in the Settlement Agreement (Section VII). The Settlement Agreement is available at www.WaterstreetSettlement.com.

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 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: *Robert Alejnikov et al. v. WaterStreet Company*, Case No. CACE-26-005928, pending in the 17th Judicial Circuit for Broward County, Florida;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) a statement as to whether the objection applies only to you, to a specific subset of the class, or to the entire class
- (4) all grounds for the objection, accompanied by any legal support for the objection known to you or your lawyer;
- (5) if you or your lawyer have objected in any other class action settlements in the past five years, provide the names, courts, and civil action number or case number for each of those cases, along with a copy of any orders related to or ruling upon your prior objections that were issued by the trial and/or appellate courts in each listed case;
- (6) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information (including any former counsel who may be entitled to compensation for any reason related to the objection);
- (7) whether or not you or your lawyer will appear at the Final Approval Hearing and would like to speak at the Hearing;
- (8) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any); and
- (9) your signature (if you have hired your own lawyer, their signature is not sufficient).

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 **August 4, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator, Class Counsel, and WaterStreet's Counsel. An objection shall be deemed to have been submitted on the date of the postmark on the envelope. If submitted by private courier (e.g., Federal Express), an objection shall be deemed to have been submitted on the shipping date reflected on the shipping label.

Clerk of the Court	Settlement Administrator
<p>Clerk of the Court 17th Judicial Circuit for Broward County, Florida 201 SE 6th Street Ft. Lauderdale, FL 33301</p>	<p>WaterStreet Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958</p>
Class Counsel	Counsel for Defendants
<p>Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301</p> <p>Mariya Weekes Milberg PLLC 333 S.E. 2nd Ave., Ste. 2000 Miami, FL 33131</p> <p>Rachel Dapeer Dapeer Law, P.A. 520 S. Dixie Hwy., Ste. 240 Hallandale Beach, FL 33009</p> <p>Manuel Hiraldo Hiraldo P.A. 401 E. las Olas Blvd., Ste. 1400 Fort Lauderdale, FL 33301</p>	<p>Carolyn Purwin Ryan Mullen Coughlin LLC 426 W. Lancaster Ave., Ste. 200 Devon, PA 19333</p>

More information about this process and the deadlines can be found in the Settlement Agreement (Section VII). The Settlement Agreement is available at www.WaterstreetSettlement.com.

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 or bound by the Settlement Agreement. 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 3, 2026 at 8:45am Eastern Time**, in Room 16-150 of the 17th Judicial Circuit for Broward County, Florida, at 201 SE 6th Street, Ft. Lauderdale, FL 33301. 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 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.WaterstreetSettlement.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** and be bound by any Judgment issued by the Court along with the terms of the Settlement Agreement.

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.WaterstreetSettlement.com.

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

- Email: info@WaterstreetSettlement.com
- Call toll free, 24/7: 1- (833) 421-7237
- By mail: WaterStreet 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, 17th Judicial Circuit for Broward County, Florida, at 201 SE 6th Street, Ft. Lauderdale, FL 33301.

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