

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*United States District Court, Central District of California, Western Division
Adnan Ansar v. The Gill Corporation
Case No. 2:24-CV-08875*

IF YOUR PERSONAL INFORMATION WAS POTENTIALLY IMPACTED BY A CYBERSECURITY INCIDENT THAT THE GILL CORPORATION INITIALLY DISCLOSED ON OR AROUND SEPTEMBER 2024, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR LEGAL RIGHTS

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

- A Settlement has been reached with The Gill Corporation, (“TGC” or “Defendant”) in a class action lawsuit about a cybersecurity incident that was disclosed on or around September 2024 (“Data Breach”).
- The Lawsuit is captioned *Adnan Ansar v. The Gill Corporation*, Case No. 2:24-CV-08875 (the “Action”), pending in the United States District Court, Central District of California, Western Division. TGC denies the allegations and all liability or wrongdoing with respect to any and all facts and claims alleged in the Lawsuit but has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is an individual who resides in the United States whose Personal Information was potentially compromised in the Data Breach experienced by TGC on or about June 23, 2024, and disclosed publicly in September 2024.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

PARA LEER ESTE AVISO EN ESPAÑOL, VISITE WWW.TGCSETTLEMENT.COM O LLAME AL 1-800-862-0166.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	<p>The only way to receive cash and other benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>You can submit your Claim Form online at www.TGCSettlement.com or 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 20, 2026
OPT OUT OF THE SETTLEMENT	<p>You can choose to opt out of the Settlement and receive no payment. 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 elect to retain your own legal counsel at your own expense.</p>	June 19, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	<p>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 benefits.</p>	June 19, 2026
DO NOTHING	<p>Unless you opt out of the Settlement, you are part of the Settlement. If you do nothing, you will not get a payment 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.</p>	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?

A federal court authorized this Notice because 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 United States District Court, Central District of California, Western Division is overseeing this class action. The lawsuit is captioned *Adnan Ansar v. The Gill Corporation.*, Case No. 2:24-CV-08875. The person that filed this lawsuit is called the “Plaintiff” and the company he sued is called the “Defendant.”

2. What is this Lawsuit about?

This Lawsuit alleges that personal information was impacted by the cybersecurity incident that TGC initially disclosed on or around September 2024 (“Data Breach”).

3. What is a class action?

In a class action, one or more individuals represent other people with similar claims. These individuals are known as “Class Representatives.” Together, the people included in the class action are called a

“Class” or “Class Members.” The court resolves the lawsuit for all Settlement Class Members, except for those who opt out from a settlement. In this Settlement, the Class Representative is Adnan Ansar.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or the Defendant. The Defendant denies all claims and contends that it has not violated any laws. Plaintiff and the Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to receive payments. The Plaintiff and his attorneys think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals residing in the United States whose Personal Information was compromised in the Data Breach discovered by TGC in June 2024, including all those individuals who received notice of the breach. If you received a Notice by mail or email, you have been identified as a member of the Settlement Class.

To identify and notify Settlement Class Members, the Settlement Administrator used contact information provided by TGC, including each individual’s last known mailing address, email address, and telephone number. The Administrator also performed change-of-address checks and skip tracing to locate updated addresses before mailing notices. Email addresses will be used to provide notice to any Class Members whose mailed notices is returned as undeliverable after these efforts.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) TGC and its related entities; (ii) any judges assigned to this case and their staff and family; (iii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; and (iv) the successors or assigns of any such excluded natural person.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by emailing or writing to Settlement Administrator at:

TGCSettlement@atticusadmin.com
The Gill Corporation
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

You may also view the Settlement Agreement and Release (“Settlement Agreement”) at www.TGCSettlement.com.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Under the Settlement, TGC will create a Settlement Fund consisting of \$300,000.00 to pay valid and timely claims for Documented Loss Payments, *pro rata* Cash Fund Payments, and Credit Monitoring and Insurance Services (“CMIS”), as explained below.

8. How much will my payment be?

Payments will vary based on the type of benefit selected by each Settlement Class Member and the number of Settlement Class Members that participate in the Settlement.

Benefits to Choose From: Settlement Class Members may submit a Claim Form for **one** of these two options: (1) Documented Loss Payments – up to a total of \$5,000 per claimant; OR (2) a Cash Fund Payment that will depend on how many people submit claims (each person’s *pro rata* share of the remaining fund). In addition, Settlement Class Members may **also** request two years of three-bureau Credit Monitoring and Insurance Services (“CMIS”).

- **Documented Loss Payment:** To receive reimbursement for out of pocket losses related to the Data Incident, you must include with your Claim Form, proof showing that: (1) The loss is an actual, documented, and unreimbursed monetary loss arising from identity theft, fraud, or similar misuse; (2) the loss was more likely than not caused by the Data Breach; and (3) the loss occurred between June 23, 2024 and August 22, 2025.
- **Cash Fund Payment:** Settlement Class Members can make a claim to receive a *pro rata* Cash Fund Payment. The amount of each cash payment will depend on (1) the total number of valid claims submitted, and (2) the total amount paid to claimants who request reimbursement for documented losses. After deducting administrative costs, attorneys’ fees, and the service award, the Settlement Administrator will pay approved documented loss claims first, and then divide the remaining funds equally among all claimants who select the Cash Fund Payment option. Based on current estimates, if there are no claims for documented losses and approximately 10% of Class Members submit valid claims for a Cash Fund Payment, each claimant would receive about \$520. However, if more than 10% of Class Members submit Claim Forms or if valid documented loss claims are paid, the amount of each Cash Fund Payment will be reduced on a *pro rata* basis. Settlement Class Counsel estimates that each Settlement Class Member who submits a claim for a *pro rata* Cash Payment will likely receive in excess of \$100.

- **Credit Monitoring Services.** In addition to making a claim for a Documented Loss Payment or a Cash Fund Payment, Settlement Class Members also may make a claim to receive two (2) years of three-bureau credit monitoring and identity theft protection services with \$1 million in insurance by choosing this benefit on the Claim Form.

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

Unless you exclude yourself from the Settlement, you give up your right, if any, to sue or continue to sue TGC about the claims covered by this Settlement. The specific claims you release are described in the “Release” section of the Settlement. The Settlement Agreement, available at www.TGCSettlement.com, describes the legal claims that you give up if you remain in the Settlement Class.

HOW TO GET A PAYMENT - MAKING A CLAIM

10. How do I submit a claim and get a cash payment?

Claim Forms may be submitted online at www.TGCSettlement.com or printed from the website and mailed to the Settlement Administrator at: *The Gill Corporation, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164.*

You may also contact the Settlement Administrator to request a Claim Form by telephone 1-800-862-0166, by email TGCSettlement@atticusadmin.com, or by U.S. mail at the address below.

11. What is the deadline for submitting a claim?

If you submit a claim by U.S. mail, the completed and signed Claim Form must be postmarked by **July 20, 2026**. If submitting a Claim Form online, you must do so by **July 20, 2026**.

12. When will I get my payment?

The Court will hold a final approval hearing to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a Service Award to the Class Representative who brought this Action on behalf of the Settlement Class. The date of the Final Approval Hearing will be posted to the Settlement Website. Please visit www.TGCSettlement.com for updates.

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. Settlement Payments will be distributed as soon as possible, if and when the Court grants final approval to the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes, the Court appointed the law firm of Strauss Borrelli PLLC to represent you and other members of the Settlement Class (“Settlement Class Counsel”). You will not be charged directly for these lawyers; instead, they will receive compensation from TGC (subject to Court approval). If you want to be represented by your own lawyer, you may hire one at your own expense.

14. Should I get my own lawyer?

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

15. How will the lawyers be paid?

Settlement Class Counsel will ask the Court to approve payment of attorneys’ fees and reasonable litigation costs and expenses from the Settlement Fund, in an amount not to exceed \$100,000, plus any costs and expenses incurred.

Settlement Class Counsel will also ask the Court to approve a Service Award payment of up to \$5,000 for the Class Representative, in recognition of his time and effort in representing the Class.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement and want to keep your right, if any, to sue the Defendant separately about the issues in this case, you must exclude yourself from the Settlement Class (“opt out”). The deadline to request exclusion (or opt out) is **June 19, 2026**.

You can opt out in one of two ways:

1. **Online:** Complete and submit the opt-out form at www.TGCSettlement.com; or
2. **By Mail:** You may print the opt-out form from the Settlement Website or request one by mail. Send your completed written request for exclusion to the Settlement Administrator at the address listed below. If you do not have internet access or postage, you may call 1-800-862-0166 to request a pre-stamped envelope and opt-out form at no cost.

Your written request to opt out must include:

- The case name: *Adnan Ansar v. The Gill Corporation*;
- Your full name; current address, and telephone number;
- Your unique identifier (found on the Notice mailed or emailed to you);

- The name of any attorney representing you (if applicable);
- Your personal signature; and
- A clear statement such as “Request for Exclusion” or “I do not wish to participate in the Settlement.

Your completed request for exclusion must be submitted online at www.TGCSettlement.com or mailed to the Settlement Administrator at the address below, and must be submitted or postmarked no later than **June 19, 2026**.

The Gill Corporation Data Breach
c/o Atticus Administration
ATTN: Exclusion Request
PO BOX 64053
Saint Paul, MN 55164

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 a payment or any other benefits under the Settlement if you exclude yourself. You may only exclude yourself – not any other person.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I like or 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 disagree with any part of it. You can explain to the Court why you think the Settlement should not be approved.

Your written objection must include: (a) the case name and number (*Adnan Ansar v. The Gill Corporation, Case No. 2:24-cv-08875-MEMF-SP*); (b) your full name, current mailing address, and telephone number; (c) a statement confirming you are a member of the Settlement Class, with proof, such as a copy of your Settlement Notice or Data Breach Notice; (d) the reasons you object to and whether your objection applies to part or all of the Settlement; identify the specific grounds for the objection; (e) whether you plan to appear at the Final Approval Hearing and/or if you will have an attorney represent you; (f) identify any attorneys representing you, if any; (g) a list of all other cases in which you have objected to a class settlement; and (h) our signature (or your attorney’s signature if you are represented).

If you do not submit a timely, written objection, you will give up your right to object or speak at the Final Approval Hearing and will be bound by the Settlement and all related Court orders.

Your objections must be mailed to the Settlement Administrator and Settlement Class Counsel and postmarked no later than **June 19, 2026**.

The Gill Corporation Data Breach
c/o Atticus Administration
ATTN: Objection Request
PO BOX 64053
Saint Paul, MN 55164

and

STRAUSS BORRELLI PLLC
One Magnificent Mile
980 N. Michigan Avenue, Ste. 1610
Chicago, IL 60611

18. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can only object to the Settlement if you do not exclude yourself from the Settlement (you cannot request to be excluded and object to 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

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

The Court will hold a final approval hearing at the United States District Court, Central District of California, Western Division, at 350 W 1st Street, Suite 4311, Los Angeles, CA 90012, in Courtroom 8B on the 8th Floor, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a Service Award Payment to the Class Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost. The date and time of this hearing is not yet scheduled. Please check www.TGCSettlement.com for updates.

20. 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. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. 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 such attendance is not necessary for the Court to consider an objection that was filed on time and meets the requirements above.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights explained in **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, about the legal issues resolved by this Settlement. In addition, you will not receive any payments or benefits from this Settlement.

GETTING MORE INFORMATION

22. 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.TGCSettlement.com.

If you prefer to read this Notice in Spanish, visit www.TGCSettlement.com or call 1-800-862-0166 to request a printed Spanish version. *Para leer este aviso en español, visite www.TGCSettlement.com o llame al 1-800-862-0166.*

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: TGCSettlement@atticusadmin.com

Toll-Free: 1-800-862-0166

Mail:

The Gill Corporation Data Breach
c/o Atticus Administration
PO BOX 64053
Saint Paul, MN 55164

Publicly filed documents can also be obtained by visiting the office of the United States District Court, Central District of California, Western Division or by reviewing the Court's online docket.

PLEASE DO NOT CONTACT THE COURT OR TGC