

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Barnett, et al. v. St. Andrew's Resources for Seniors System

Case No. 2522-CC09432

Circuit Court for the City of St. Louis, Missouri

IF YOU WERE SENT NOTICE THAT YOUR PRIVATE INFORMATION MAY HAVE BEEN IMPACTED IN A FEBRUARY 2024 DATA INCIDENT INVOLVING ST. ANDREW'S RESOURCES FOR SENIORS SYSTEM, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS AND ENTITLE YOU TO SETTLEMENT 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 St. Andrew's Resources for Seniors System ("St. Andrew's" or "Defendant") in a proposed class action lawsuit. This case involves a February 2024 cybersecurity incident in which a criminal third party gained unauthorized access to certain of Defendant's employee email accounts (the "Data Incident"). The PII/PHI of certain individuals may have been impacted in the Data Incident. This information may have included: names, addresses, Social Security numbers, driver's license numbers, state identification numbers, passport numbers, military identification numbers, financial account information, payment card information, health insurance information, and/or medical information.
- The lawsuit is called *Barnett, et al. v. St. Andrew's Resources for Seniors System*, Case No. 2522-CC09432. It is pending in the Circuit Court for the City of St. Louis, Missouri (the "Litigation").
- St. Andrew's denies that it did anything wrong, and denies all claims, allegations, and liability. The Court has not made a determination that St. Andrew's did anything wrong.
- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- You have been identified as a Settlement Class Member, and you may be entitled to benefits under the Settlement.
- 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 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.StAndrewsDataSettlement.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>	SUBMITTED, EMAILED OR POSTMARKED BY MAY 21, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no Settlement Benefits. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	APRIL 21, 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.	APRIL 21, 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 Benefits 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.	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	6
THE LAWYERS REPRESENTING YOU	6
EXCLUDING YOURSELF FROM THE SETTLEMENT	7
OBJECTING TO THE SETTLEMENT	7
THE FINAL APPROVAL HEARING	9
IF I DO NOTHING.....	9
GETTING MORE INFORMATION	9

Basic Information

1. Why was this Notice issued?

The Circuit Court for the City of St. Louis, Missouri, 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 *Barnett, et al. v. St. Andrew’s Resources for Seniors System*, Case No. 2522-CC09432. It is pending in the Circuit Court for the City of St. Louis, Missouri. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, St. Andrew’s Resources for Seniors System, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that, in February 2024, Defendant became aware of a cybersecurity incident involving a criminal third party gaining unauthorized access to certain of Defendant’s employee email accounts. These files may have contained personal information such as names, addresses, Social Security numbers, driver’s license numbers, state identification numbers, passport numbers, military identification numbers, financial account information, payment card information, health insurance information, and/or medical 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 Settlement, the Class Representatives are Dinah Barnett, Kristen Kurtz Kohlberg, Steven Shireman, Mattie Arnold, and Ralph Williams. Everyone included in this Action are the 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 Class Members to receive Settlement Benefits. The Plaintiffs and their attorneys think the Settlement is best for all 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 in the United States who received Notice, including notice of this Settlement, that their PII/PHI may have been impacted in the Data Incident.” In this sentence, PII means Personally Identifiable Information, and PHI means Protected Health Information.

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s direct family and staff; (2) St. Andrew's and its officers, directors, subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or their parents have a controlling interest; (3) Settlement Class Members who submit a valid request for exclusion prior to the Opt-Out Deadline; (4) governmental entities; and (5) any 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 Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@StAndrewsDataSettlement.com
- Call toll free, 24/7: 1-833-647-9065
- By mail:

St. Andrew's 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.StAndrewsDataSettlement.com

The Settlement Benefits

7. What does the Settlement provide?

St. Andrew's has agreed to pay for a number of different benefits. Everyone may claim two years of **Monitoring Services** and one or more cash payments. The Settlement Benefits are explained in more detail below.

MONITORING SERVICES. All Class Members are eligible to enroll in two years of **CyEx Medical Shield Complete**. This comprehensive service comes with \$1 million of medical identity theft insurance, and includes monitoring for:

- healthcare insurance ID exposure
- Medical Record Number (MRN) exposure
- unauthorized Health Savings Account (HSA) spending

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

Compensation for Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses traceable to the Data Incident, you may submit a claim, not to exceed **\$5,000.00**. The losses must have occurred between February 8, 2024, and May 21, 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 documented 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.

Compensation for Lost Time. Class Members who spent time responding to the Data Incident may claim up to four hours, at \$20.00 per hour, for a maximum of **\$80.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- changing your passwords
- investigating suspicious activity in your accounts
- researching the Data Incident

Alternative Cash Payment. *Instead of a payment for either Out-of-Pocket Losses or Lost Time, you may claim a one-time \$50.00 cash payment. You do not have to provide any proof or explanation to claim this payment.*

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

- Email: info@StAndrewsDataSettlement.com
- Call toll free, 24/7: 1-833-647-9065
- By mail:

St. Andrew's 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 Class?

If you stay in the class, you won't be able to be part of any other lawsuit against Defendant or the Released Parties for any of the Released Claims. The "Releases" section of the Settlement Agreement (Section IX) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.StAndrewsDataSettlement.com.

Submitting a Claim Form for a Settlement Benefits

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

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

St. Andrew's Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-647-9065, by email info@StAndrewsDataSettlement.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 21, 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 **May 21, 2026**.

11. When will the Settlement Benefits be issued?

The Court will hold a Final Approval Hearing on June 8, 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 Maureen M. Brady of McShane & Brady, LLC; Eduard Korsinsky of Levi & Korsinsky, LLP; J. Gerard Stranch, IV of Stranch, Jennings & Garvey, PLLC; Tyler J. Bean of Siri & Glimstad LLP; Raina C. Borrelli of Strauss Borrelli PLLC; and David K. Lietz of Milberg Coleman Bryson Phillips 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 \$265,000.00 as reasonable attorneys' fees and costs of litigation. If approved, these fees and costs will be paid by Defendant. The Court may award less than this amount.

Class Counsel will also ask for Service Award payments of \$3,500.00 for each of the Class Representatives, not to exceed \$17,500.00. Any approved Service Awards will also be paid by Defendant. The Court may award less than this amount.

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. However, you will keep any rights you may have to sue Defendant or Released Parties 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 **April 21, 2026**.

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

- (1) the name and number of the Litigation: *Barnett, et al. v. St. Andrew's Resources for Seniors System*, Case No. 2522-CC09432, pending in the Circuit Court for the City of St. Louis, Missouri;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (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:

St. Andrew's Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted or postmarked by **April 21, 2026**. You cannot opt out by telephone or email.

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) the name and number of the Litigation: *Barnett, et al. v. St. Andrew's Resources for Seniors System*, Case No. 2522-CC09432, pending in the Circuit Court for the City of St. Louis, Missouri;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) documentation that proves that you are a Class Member (such as the Email Notice or Postcard Notice you have received);
- (4) whether the objection applies only to you, or to other Class Members, as well;
- (5) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (6) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (7) if you have hired your own lawyers, also provide their background and experience, how much they expect to charge, and how they calculated that number;

- (8) if you or your lawyer have objected in any other cases in the past five years, list the names, courts, and civil action numbers for each of those cases;
- (9) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (10) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both; and
- (11) 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 **April 21, 2026**. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 10 North Tucker Blvd. St. Louis, Missouri 63101	St. Andrew's Data Incident Settlement c/o Settlement Administrator 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 Final Approval Hearing

18. When is the Final Approval Hearing?

The Court will hold a Final Approval Hearing on **June 8, 2026, at 9:30 a.m., Central Time**, at The Mel Carnahan Courthouse Division 20, 8th Floor, 1114 Market Street, St. Louis, Missouri 63101 before Judge Moriarity. At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide whether to approve Class Counsel's Fee and Expense Application and whether to award Service Awards to the Class Representatives. The Court will also consider any timely and valid objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The location, date, or time of this hearing may change without further notice. Please check www.StAndrewsDataSettlement.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 any Settlement Benefits. You will also 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. 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.StAndrewsDataSettlement.com.

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

- Email: info@StAndrewsDataSettlement.com
- Call toll free, 24/7: 1-833-647-9065
- By mail:

St. Andrew's 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, 10 North Tucker Blvd., St. Louis, Missouri 63101. **DO NOT CONTACT THE COURT, THE CLERK OF COURT, CLASS COUNSEL, OR DEFENDANT'S COUNSEL REGARDING THIS SETTLEMENT.**