

## **NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Circuit Court of Jackson County, Missouri

*Beasley v. Southeast Series of Lockton Companies, LLC, et al.*, Case No. 2516-CV36137

### **Were you notified that your Private Information may have been compromised in a cybersecurity incident that Southeast Series of Lockton Companies experienced in November 2024? A proposed class action settlement may affect your rights.**

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

- A Settlement has been reached with Southeast Series of Lockton Companies, LLC and Lockton Companies, LLC (“Defendants”) in a class action lawsuit concerning a cybersecurity incident that occurred on November 20, 2024 (“Data Incident”).
- You are included in this Settlement if you are a Settlement Class Member,<sup>1</sup> which includes all persons residing in the United States who were notified of the Data Incident.
- As a Settlement Class Member, your rights are affected whether you act or do not act. Please read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM FORM</b>	The only way to receive cash and other benefits from this Settlement is by submitting a valid and timely Claim Form.  You can submit your Claim Form online at <b><u><a href="http://www.TheLocktonDataSettlement.com">www.TheLocktonDataSettlement.com</a></u></b> or mail it to the Settlement Administrator. You may also call the Settlement Administrator to receive a paper copy of the Claim Form.	<b>April 7, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	You can choose to opt out of the Settlement. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can elect to retain your own legal counsel at your own expense. If you opt out, you will not be able to receive any benefits and you will be bound by the terms of the Settlement Agreement.	<b>April 7, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	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.	<b>April 7, 2026</b>
<b>DO NOTHING</b>	If you do nothing, you will not receive any benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendants 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.

<sup>1</sup> The Settlement Agreement defines all capitalized terms not otherwise defined in this Notice. The Settlement Agreement is available on the Settlement Website at **[www.TheLocktonDataSettlement.com](http://www.TheLocktonDataSettlement.com)**.

## **WHAT THIS NOTICE CONTAINS**

### **Basic Information**

1. Why was this Notice issued?.....	3
2. What is this lawsuit about?.....	3
3. What is a class action?.....	3
4. Why is there a Settlement?.....	3

### **Who is in the Settlement?**

5. Who is included in the Settlement?.....	3
6. Are there exceptions to being included?	4

### **The Settlement Benefits**

7. What can I get from this Settlement?.....	4
8. Tell me more about Cash Payment A – Documented Losses.....	4
9. Tell me more about Cash Payment B – <i>Pro Rata</i> Cash.....	4
10. Tell me more about Financial Data Monitoring. ....	5
11. What claims am I releasing if I stay in the Settlement Class?.....	5

### **How to get Settlement Class Member Benefits – Making a Claim**

12. How do I submit a Claim Form and get Settlement Class Member Benefits?.....	5
13. When will I get my Settlement Benefits?.....	5

### **The Lawyers Representing You**

14. Do I have a lawyer in this case?.....	5
15. Should I get my own lawyer?.....	6
16. How will the lawyers be paid?.....	6

### **Excluding Yourself from the Settlement**

17. How do I opt out of the Settlement?.....	6
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### **Objecting to the Settlement**

18. How do I tell the Court if I do not like the Settlement?.....	6
19. What is the difference between objecting and opting out?.....	8

### **The Court's Final Approval Hearing**

20. When is the Court's Final Approval Hearing?.....	8
21. Do I have to come to the Final Approval Hearing?.....	8

### **If you Do Nothing**

22. What happens if I do nothing at all?.....	8
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### **Getting More Information**

23. How do I get more information?.....	8
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## **BASIC INFORMATION**

### **1. Why was this Notice issued?**

A 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 lawsuit is captioned *Beasley v. Southeast Series of Lockton Companies, LLC, et al.*, Case No. 2516-CV36137 (Circuit Court of Jackson County, Missouri). The people who filed this lawsuit are called the “Plaintiffs” and the companies they sued, Southeast Series of Lockton Companies, LLC and Lockton Companies, LLC, are called the “Defendants.”

### **2. What is this lawsuit about?**

This lawsuit alleges that Private Information (such as names, some Social Security numbers, dates of birth, health information, and medical information) was impacted by the Data Incident that affected Defendants on or around November 20, 2024.

Defendants deny all of the Plaintiffs’ claims and maintain that they did nothing wrong.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. The individuals who sue are known as “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Settlement, the Class Representatives are Penny Beasley, Brittany Ward, Devin Carrasquillo, Rex Lawson, Michael Tucker, Hunter Carter, Mary Parrott, Tyrone Kenneth Johnson, Herman Island, Dennis Whiting, Madeline Whelan, Stacey Nolley, Danny Nguyen, Alicia Bravo, and Zach Pettis.

### **4. Why is there a Settlement?**

The Court did not decide in favor of the Plaintiffs or Defendants. The Defendants deny all claims and contend that they have not violated any laws. Plaintiffs and the Defendants agreed to a settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim payments and other benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members, 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 living persons in the United States who were notified of the Data Incident.

## **6. Are there exceptions to being included?**

Yes. Excluded from the Settlement Class are (1) Defendants and their officers and directors; (2) all people who submit a timely and valid opt out from the Settlement Class; (3) the Court, the Judge's immediate family, and Court staff.

## **THE SETTLEMENT BENEFITS**

## **7. What can I get from this Settlement?**

If approved by the Court, Defendants will pay up to \$9,900,000 to resolve the Settlement. Of this, up to \$3,000,000 will be available to reimburse documented losses and \$5,900,000 will be used to create a Common Settlement Fund.

There are two types of Cash Payments that are available to Settlement Class Members. Settlement Class Members may elect to receive one of the following in addition to Financial Data Monitoring:

- (1) **Cash Payment A – Documented Losses:** Reimbursement of up to \$5,000 in documented losses per person, subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims received; or
- (2) **Cash Payment B – *Pro Rata* Cash:** A *pro rata* share of the Common Settlement Fund after the payment for Financial Data Monitoring, Settlement Administration Costs, any Court-approved deductions, and depending upon the number of Valid Claims for Cash Payment B received.

In addition to electing a Cash Payment, all Settlement Class Members will automatically be entitled to receive one year of CyEx Financial Shield Complete, regardless of whether they file a Claim.

## **8. Tell me more about Cash Payment A – Documented Losses.**

Settlement Class Members may submit a claim for Cash Payment A – Documented Losses up to \$5,000 per person if they can show documented losses that are fairly traceable to the Data Incident. If the amount needed to pay all Valid Claims for Cash Payment A exceeds \$3,000,000, payment amounts for Cash Payment A claims will be reduced *pro rata*.

Documented losses may include unreimbursed losses relating to fraud or identity theft; professional fees including attorneys' fees, accountants' fees, and fees for credit repair services; costs associated with freezing or unfreezing credit with any credit reporting agency; credit monitoring costs that were incurred on or after the applicable Data Incident through the date of claim submission; and miscellaneous expenses such as notary, facsimile, postage, copying, mileage, and long-distance telephone charges.

## **9. Tell me more about Cash Payment B – *Pro Rata* Cash.**

As an alternative to Cash Payment A, Settlement Class Members may submit a claim for Cash Payment B, which will entitle them to receive a *pro rata* share of the cash remaining in the Common Settlement Fund after deducting the payment for Financial Data Monitoring, Settlement Administration Costs, Service Awards, and attorneys' fees and costs. *Pro rata* means that all Settlement Class Members who submit a Valid Claim for Cash Payment B will receive the same amount.

#### **10. Tell me more about Financial Data Monitoring.**

In addition to Cash Payment A or Cash Payment B, all Settlement Class Members will automatically be entitled to one year of CyEx Financial Shield Complete, which includes credit monitoring with one credit bureau, financial transaction monitoring, monthly credit score and tracker, fictitious identity monitoring, bank and financial account monitoring, address change monitoring, home title monitoring, dark web monitoring, real-time authentication alerts, high-risk transaction monitoring, lost wallet protection, \$1,000,000 of insurance coverage for identity theft with no deductible, security freeze assist, victim assistance, and customer support.

#### **11. What claims am I releasing if I stay in the Settlement Class?**

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants about any of the legal claims this Settlement resolves. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at [www.TheLocktonDataSettlement.com](http://www.TheLocktonDataSettlement.com).

### **HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM**

#### **12. How do I submit a Claim Form and get Settlement Class Member Benefits?**

You must submit a Claim Form by **April 7, 2026**. Claim Forms may be submitted online at [www.TheLocktonDataSettlement.com](http://www.TheLocktonDataSettlement.com) or mailed to the Settlement Administrator at: *Beasley v. Southeast Series of Lockton Companies, LLC, et al.*, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

#### **13. When will I get my Settlement Class Member Benefits?**

The short answer is – after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **May 7, 2026, at 9:00 a.m.**, to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Class Counsel for representing the Settlement Class, and Service Award payments to the Class Representatives who brought this Action on behalf of the Settlement Class.

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 Class Member Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

### **THE LAWYERS REPRESENTING YOU**

#### **14. Do I have a lawyer in this case?**

Yes, the Court appointed Gary Klinger of Milberg PLLC, Jeff Ostrow of Kopelowitz Ostrow P.A., and Maureen Brady of McShane & Brady, LLC, to represent you and the other members of the Settlement Class (“Class Counsel”). You will not be charged directly for these lawyers; instead, they will receive compensation from Defendants consistent with the Settlement Agreement (subject to Court approval).

If you want to be represented by your own lawyer, you may hire one at your own expense.

### **15. Should I get my own lawyer?**

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

### **16. How will the lawyers be paid?**

Class Counsel will ask the Court to approve attorneys' fees of up to \$2,966,666.66 and Case Costs. If approved, these amounts will be paid pursuant to the terms of the Settlement Agreement and before calculating and distributing Cash Payment B payments to Settlement Class Members who submit Valid Claims.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

### **17. How do I opt out of the Settlement?**

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendants about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "Opting Out" of the Settlement Class. The Opt-Out Deadline to submit a request for exclusion from the Settlement is **April 7, 2026**.

To exclude yourself from the Settlement, you must submit a written request for exclusion to the Settlement Administrator that includes the following information:

- your full name, address, telephone number, and email address (if any);
- A statement indicating that you want to opt out of the Settlement Class, such as "I wish to be excluded from the Settlement Class in *Beasley v. Southeast Series of Lockton Companies, LLC, et al.*, Case No. 2516-CV36137"; and
- your personal signature.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **April 7, 2026**.

*Beasley v. Southeast Series of Lockton Companies, LLC, et al.*  
c/o Kroll Settlement Administration LLC  
ATTN: Exclusion Request  
P.O. Box 5324  
New York, NY 10150-5324

## **OBJECTING TO THE SETTLEMENT**

### **18. How do I tell the Court if I 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 do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for attorneys' fees and costs, Service Awards, the releases provided to the Defendants, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include:

- a. your full name, mailing address, telephone number, and email address (if any);
- b. the grounds for the objection, including any legal support for the objection known to you or your counsel;
- c. the number of times you have objected to a class action settlement within the five years preceding the date of your objection, the caption of each case you objected to, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- d. the identity of all counsel who represent you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the settlement and/or application for attorneys' fees, costs, and service awards;
- e. the number of times your counsel and/or counsel's law firm has objected to a class action settlement within the five years preceding the date of your objection, the caption of each case counsel or the firm has made such objection and a copy of any orders related to or ruling upon those prior objections that were issued by the trial and appellate courts in each listed case in which your counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- f. the identity of all counsel (if any) representing you who will appear at the Final Approval Hearing;
- g. a list of all persons who will be called to testify at the Final Approval Hearing in support of your objection (if any);
- h. a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing;
- i. your signature (an attorney's signature is not sufficient).

Objections must be filed with the Court no later than **April 7, 2026**.

Eastern Jackson County Courthouse  
Clerk of the Court  
308 W. Kansas Avenue  
Independence, MO 64050

A copy of your objection also must be mailed to Class Counsel, Defendants' Counsel, and the Settlement Administrator at the addresses below, postmarked no later than **April 7, 2026**.

CLASS COUNSEL	DEFENDANTS' COUNSEL	SETTLEMENT ADMINISTRATOR
Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 -and- Gary M. Klinger Milberg PLLC 227 West Monroe Street, Ste. 100 Chicago, IL 60606	Alfred J. Saikali Shook, Hardy & Bacon L.L.P. 201 S. Biscayne Blvd. Ste. 3200 Miami, FL 33131	<i>Beasley v. Southeast Series of Lockton Companies, LLC, et al.</i> c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box 5324 New York, NY 10150-5324

### **19. What is the difference between objecting and opting out?**

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 it. Excluding yourself from the Settlement is telling the Court you do not want to be part of the Settlement. If you exclude yourself/opt out of the Settlement, you cannot object to it because the settlement no longer affects you.

### **THE COURT'S FINAL APPROVAL HEARING**

### **20. When is the Court's Final Approval Hearing?**

The Court is scheduled to hold a Final Approval Hearing on **May 7, 2026, at 9:00 a.m.**, at Eastern Jackson County Courthouse, 308 W. Kansas Avenue, Independence, Missouri, 64050, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Class Counsel for representing the Settlement Class, and whether to award Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check **www.TheLocktonDataSettlement.com** for updates.

### **21. 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 file an objection, you may, but 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 it is not necessary.

### **IF YOU DO NOTHING**

### **22. What happens if I do nothing at all?**

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendants and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the releases of the Released Parties in the Settlement and not be eligible to receive any Settlement Class Member Benefits.

### **GETTING MORE INFORMATION**

### **23. 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.TheLocktonDataSettlement.com**.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone or mail:

Toll-Free: (833) 754-7264

Mail: *Beasley v. Southeast Series of Lockton Companies, LLC, et al.*, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANTS.**