

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF PLACER

*Bente, et al. v. Granite Wellness Centers*, Case No: S-CV-0050671

**If you are or were a Granite Wellness Centers (“GWC”) patient who was impacted by GWC’s data security incident and/or GWC sent you a notice of a data security incident on or around March 6, 2021, you may be eligible for a cash payment in a class action settlement.**

**A settlement has been reached for Granite Wellness patients impacted by the data incident**

*A court authorized this notice. This is not a solicitation from a lawyer.*

- A settlement has been reached in a consolidated class action lawsuit against Granite Wellness Centers (“GWC”) about a data security incident that occurred on January 5, 2021 (the “Data Security Incident”), in which Plaintiff allege that personally identifiable information (“PII”) including names, dates of birth, home addresses, dates of care, treatments, treatment providers, health information, health insurance information, driver’s license numbers, medical histories, Social Security numbers, and bank account numbers was potentially exposed. A lawsuit was filed against GWC, alleging that it did not take appropriate care to protect the data that was potentially exposed. GWC denies all of Plaintiffs’ claims in the lawsuit and maintains it did not do anything wrong and that the potential exposure of data did not cause harm to any individuals. The parties have agreed to settle to avoid the expense and burdens of litigation.
- The settlement includes all individuals residing in the United States whose personally identifiable information or protected health information was accessed or acquired without authorization during the Data Security Incident (“Settlement Class Members”).
- The settlement allows Settlement Class Members to request either a pro-rata cash payment estimated to be **\$750.00**, subject to proration (the “Alternative Cash Payment”) **or** reimbursement of out-of-pocket losses fairly traceable to the Data Security Incident (up to **\$5,000.00**). California residents can claim an additional **\$100.00**, subject to proration.
- You must use the Notice ID and Confirmation Code received with your postcard notice to verify your identity as a Settlement Class Member. **If you did not receive this information, but you believe you may be a Settlement Class Member, please call 1-888-995-4054 to verify your identity and membership in the Settlement Class and receive further information on how to file a claim.**

**Your legal rights are affected even if you do nothing. Read this Notice carefully.**

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT |  |
|--|--|
| Submit a Claim                                   | The only way to get a cash payment. You must submit a claim by <b>April 27, 2026</b> .   |
| Ask to be Excluded                               | Get no payment. This is the only option that allows you to sue GWC over the claims resolved by this settlement. You must exclude yourself by <b>March 28, 2026</b> . |
| Object   | Write to the Settlement Administrator about what you do not like about the settlement. You must object by <b>March 28, 2026</b> .                                    |
| Do Nothing                                       | Get no payment. Give up rights.  |

- 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 grant final approval of the settlement. Payments will only be made after the Court grants final approval of the settlement and after any appeals are resolved.

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call 1-888-995-4054 toll-free

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## BASIC INFORMATION

### 1. Why was this Notice issued?

The Court authorized this notice because you have a right to know about the proposed settlement in this class action lawsuit and about all of your options before the Court decides whether to give “final approval” to the settlement. This notice explains the legal rights and options that you may exercise before the Court decides whether to approve the settlement.

This matter involves a lawsuit in the Superior Court of California, Placer County (*Bente, et al. v. Granite Wellness Centers*, Case No: S-CV-0050671). The persons who sued are called the Plaintiffs. GWC is called the Defendant.

### 2. What is this lawsuit about?

The lawsuit claims that GWC was responsible for allowing the Data Security Incident to occur, and asserts claims for negligence, negligence per se, breach of implied contract, unjust enrichment, and declaratory judgment. The lawsuit seeks compensation for people to whom GWC sent notice of the Data Security Incident.

GWC denies all of the Plaintiffs’ claims and maintains it did not do anything wrong and that the potential exposure of data did not cause harm to any individuals.

### 3. Why is this lawsuit a class action?

In a class action, a small number of persons are called the “Representative Plaintiffs” and sue on behalf of all people who have similar claims. All of these people together are the “Class” or “Class Members.” In this case, the Representative Plaintiffs are Jennifer Bente, Raymond Bente, Mary Graham, Alexandra Corona, and Cameron Corona. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

### 4. Why is there a settlement?

By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid timely claims will get compensation. The Representative Plaintiffs and their attorneys believe the settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class and its members. The settlement does NOT mean that GWC did anything wrong.

## WHO IS IN THE SETTLEMENT?

### 5. How do I know if I am included in the settlement?

You are included in the Settlement Class if your personal identifying information or personal health information was accessed or acquired without authorization in the Data Security Incident. GWC sent notice of the Security Incident to impacted individuals for whom it had address information on or around March 6, 2021. If you did not receive notice of the Data Security Incident or a postcard notice of this Settlement by U.S. mail, but you believe you may be a Settlement Class Member, please call **1-888-995-4054** to verify your identity and membership in the Settlement Class and receive further information on how to file a claim.

Excluded from the Settlement Class are: (1) the Judge(s) presiding over the Action and members of their immediate families and their staff; (2) GWC and its affiliates, including its subsidiaries, parent companies, successors, and predecessors, any Entity in which GWC has a controlling interest, and its current or former officers and directors; (3) natural persons who properly execute and submit a Request for Exclusion prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call 1-888-995-4054 toll-free

## 6. What if I am not sure whether I am included in the settlement?

If you are not sure whether you are included in the settlement, you may call **1-888-995-4054** with questions or visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com). You may also write with questions to Bente, et al. v. Granite Wellness Centers, c/o Settlement Administrator, 1650 Arch St, Ste 2210, Philadelphia PA 19103. Please do not contact the Court with questions.

## THE SETTLEMENT BENEFITS

### 7. What does the settlement provide?

The settlement will provide cash payments to people who submit valid and timely claims.

There are three types of payments that are available to Settlement Class Members:

- (1) A *pro rata* cash payment estimated to be approximately **\$750.00**, subject to *pro rata* increase or decrease, depending upon on the number and amount of claims filed (Question 9); **or**
- (2) Reimbursement of up to **\$5,000.00** for out-of-pocket losses fairly traceable to the Data Security Incident (instead of the prorated cash payment) (Question 8); **and**
- (3) An *additional* statutory **\$100.00** cash payment, subject to *pro rata* increase or decrease, for Settlement Class Members who complete a sworn attestation that they were California residents sometime between January 5, 2021 and April 27, 2026.

You must provide proof of your Settlement Class membership when filing a claim by providing the unique Notice ID and Confirmation Code on the postcard notice you received. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please call **1-888-995-4054** to verify your identity and receive further information on how to file a claim.

If you provide a bill or payment card statement as part of required proof for any part of your claim, you may redact unrelated transactions and all but the last four digits of any account number. To claim a Documented Loss Payment, you must provide related documentation with the Claim Form, and the expense for which you are submitting a claim cannot have been reimbursed through any other source.

## 8. What payments are available for individuals who incurred out-of-pocket losses fairly traceable to the Data Security Incident?

Settlement Class Members who incurred out-of-pocket losses fairly traceable to the Data Security Incident may make a claim for a Documented Loss Payment of up to **\$5,000.00** per Settlement Class Member. This payment is subject to *pro rata* decrease depending upon the number and amount of valid claims submitted.

Out-of-pocket losses are unreimbursed costs or expenditures incurred by a Settlement Class Member that were incurred after January 5, 2021 as result of the Data Security Incident, and may include, without limitation, the following:

- Long distance telephone charges;
- Cell phone minutes (if charged by the minute);
- Internet usage charges (if either charged by the minute or incurred solely as a result of the Data Security Incident);
- Costs of credit reports purchased between January 5, 2021, and April 27, 2026;

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call **1-888-995-4054** toll-free

- Documented costs paid for credit monitoring services and/or fraud resolution services purchased between January 5, 2021, and the Claims Deadline, provided the claimant provides a sworn statement that the monitoring or service was purchased primarily because of the Data Security Incident and not for other purposes;
- Documented expenses directly associated with dealing with identity theft or identity fraud related to the Data Security Incident; and
- Other documented losses incurred by Class Members that are fairly traceable to the Data Security Incident as determined by the Settlement Administrator.

## 9. What payments are available for individuals who would prefer a cash payment in lieu of making a claim for reimbursement of out-of-pocket losses?

Class Members may elect to receive a *pro rata* cash payment, estimated to be approximately **\$750.00**, in lieu of making a claim for reimbursement of out-of-pocket losses. This cash payment is subject to *pro rata* increase or decrease, depending upon the number and amount of valid claims submitted.

## HOW TO GET BENEFITS

### 10. How do I get benefits?

To ask for a payment you must complete and submit a Claim Form. Claim Forms are available at [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com), or you may request one be sent to you by mail by calling **1-888-995-4054**. Read the instructions carefully, fill out the Claim Form, and submit it online at [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or mail it postmarked no later than **April 27, 2026** to:

Bente, et al. v. Granite Wellness Centers  
 c/o Settlement Administrator  
 1650 Arch St, Ste 2210  
 Philadelphia PA 19103

### 11. How will claims be decided?

The Settlement Administrator will decide in its professional judgment whether the information provided on a Claim Form is complete, timely and valid. The Settlement Administrator may require additional information and request it from any claimant. If the required information is not timely provided, the claim will be considered invalid and will not be paid.

## REMAINING IN THE SETTLEMENT

### 12. Do I need to do anything to remain in the settlement?

You do not have to do anything to remain in the settlement, but if you want a payment you must submit a Claim Form postmarked by **April 27, 2026**.

### 13. What am I giving up as part of the settlement?

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call **1-888-995-4054** toll-free

If the settlement becomes final, you will give up your right to sue for the claims being resolved by this settlement. You will be “releasing” GWC and all related people or entities as described in Sections 1.36, 1.37, and 4 of the Settlement Agreement. The Settlement Agreement is available at [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com).

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions, you can talk to one of the attorneys listed in Question 17 for free, or you can, of course, talk to your own lawyer at your own expense if you have questions about what this means.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want a payment from this settlement, but you want to keep the right to sue GWC about issues in this case, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or is sometimes referred to as “opting out” of – the Settlement Class.

### **14. If I exclude myself, can I get a payment from this settlement?**

No. If you exclude yourself, you will not be entitled to any benefits of the settlement, but you will not be bound by any judgment in this case.

### **15. If I do not exclude myself, can I sue GWC for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue for the claims that this settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you exclude yourself, do not submit a Claim Form to ask for a payment.

### **16. How do I exclude myself from the settlement?**

To exclude yourself, send a letter that says you want to be excluded from the settlement in the lawsuit styled *Bente, et al. v. Granite Wellness Centers* (Case No: S-CV-0050671) in the California Superior Court of Placer County. Include your name, address, and signature. You must mail your Exclusion Request postmarked by **March 28, 2026**, to:

Bente, et al. v. Granite Wellness Centers  
ATTN: Exclusion Requests  
P.O. Box 58220  
Philadelphia, PA 19102

## **THE LAWYERS REPRESENTING YOU**

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

Yes. The Court appointed the following lawyers as “Class Counsel”: Rachele R. Byrd of Wolf Haldenstein Adler Freeman & Herz LLP, 750 B Street, Suite 1820, San Diego, CA, 92101, (619) 239-4599; and Gregory Haroutunian of Clayeo C. Arnold, A Professional Corporation, 865 Howe Ave., Sacramento, CA, 95825, (916) 239-4787.

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

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

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call 1-888-995-4054 toll-free

Class Counsel will request the Court's approval of an award for attorneys' fees of up to \$241,425.00 and reasonable costs and expenses of up to \$20,000.00. Class Counsel will also request approval of service awards of \$2,000 for each of the five Representative Plaintiffs. Any amount that the Court awards for attorneys' fees, costs, expenses, and service awards will be paid from the settlement fund.

## OBJECTING TO THE SETTLEMENT

### 19. How do I tell the Court that I do not like the settlement?

You can object to the settlement if you do not like it or some part of it. The Court will consider your views. To do so, you must mail a written objection to the Settlement Administrator at the address below, or appear at the Final Approval Hearing on **April 28, 2026**.

Your objection must include all of the following:

- the name and case number of this Action (*Bente, et al. v. Granite Wellness Centers*, Case No: S-CV-0050671);
- your full name, address, telephone number, and current e-mail address (if any);
- proof that you are a Settlement Class Member, which is described in response to Question 5 (examples include the notice of this settlement you received by mail or notice of the Data Security Incident you received from GWC);
- a written statement of all grounds for the objection, accompanied by any legal support for the objection that you believe is applicable;
- the identity of all counsel representing you, if any, in connection with your objection;
- a list, including case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement in the past five (5) years; and
- a statement regarding whether you (or counsel of your choosing) intend to appear at the Final Approval Hearing.

To be timely, you must mail your objection to the Settlement Administrator and it must be postmarked no later than **March 28, 2026**.

| Settlement Administrator  |
|---|
| Bente, et al. v. Granite Wellness Centers<br>ATTN: Objections<br>P.O. Box 58220<br>Philadelphia, PA 19102 |

### 20. What is the difference between objecting and asking to be excluded?

Questions? Visit [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com) or call 1-888-995-4054 toll-free

Objecting is telling the Court that you do not like the settlement and why you do not think it should be approved. You can object only if you do not exclude yourself from the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

## THE COURT'S FINAL APPROVAL HEARING

### 21. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing at **8:30 am on April 28, 2026**, at the Superior Court of California in Placer County, 10820 Justice Center Dr, Roseville, CA 95678 to consider whether the settlement is fair, reasonable, and adequate. If there are timely objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees and reasonable costs and expenses, as well as the request for service awards for the Representative Plaintiffs. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the settlement website at <https://www.placer.courts.ca.gov/>.

### 22. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to come to the Court to talk about it. As long as you mail your written objection to the Settlement Administrator on time and according to the instructions provided in Question 19, the Court will consider it.

### 23. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must appear on **April 28, 2026**. To ensure your objection is addressed, it is recommended that you mail the objection as described in Question 19.

## IF YOU DO NOTHING

### 24. What happens if I do nothing?

If you do nothing, you will get no benefits from this settlement. Unless you exclude yourself, after the settlement is granted final approval and the judgment becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit about the legal issues in this case ever again against GWC or any related people or entities as described in Sections 1.36, 1.37 and 4 of the Settlement Agreement. The Settlement Agreement is available at [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com).

## GETTING MORE INFORMATION

### 25. How do I get more information?

This Notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com). You may also write with questions to GWC Settlement Administration, c/o Angeion Group, 1650 Arch Street GWC Data Security Incident Settlement, 1650 Arch St, Ste 2210, Philadelphia PA 19103. You can also get a Claim Form at the website, [www.GraniteWellnessDataSettlement.com](http://www.GraniteWellnessDataSettlement.com), or by calling the toll-free number, **1-888-995-4054**.