

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
CIRCUIT COURT OF THE 6th JUDICIAL CIRCUIT
CHAMPAIGN COUNTY, ILLINOIS**

***Pierce, et al. vs. Communications Data Group, Inc., Duo County Telephone Cooperative Corporation, Inc., Cumberland Cellular, LLC, and Home Wireless, Inc.,
Case No. 2026CH000032***

A court has authorized this Notice. This is not a solicitation from a lawyer.

If You Received a Notice of a Data Incident from Communications Data Group, Inc. or Home Wireless, Inc, You Could be Eligible for a Payment or other Benefits from a Class Action Settlement

- You may be eligible to receive a payment from a proposed non-reversionary class action settlement (the “Settlement”).
- The class action lawsuit concerns a cyberattack discovered in February 2025 (the “Data Incident”) on Communications Data Group, Inc.’s network. (“CDG”) in which it was determined that an unauthorized third party gained access to CDG’s systems which potentially impacted the personally identifiable information (“PII”), including for customers of Duo County Telephone Cooperative Corporation, Inc., Cumberland Cellular, LLC, Home Wireless, Inc. Approximately 137,059 individuals, including: name, address, date of birth, driver’s license information, bank account information, and Social Security numbers (collectively referred to in this Settlement Agreement as “Private Information”). The Defendants deny any wrongdoing and deny that they have any liability but have agreed to settle the Action on a classwide basis to avoid the burden and expense of litigation without in any way acknowledging fault or liability. The Settlement in no way should be construed as an admission of any liability, wrongdoing, or fault by any of the Defendants, including Communications Data Group, Inc., Duo County Telephone Cooperative Corporation, Inc., Cumberland Cellular, LLC, and Home Wireless, Inc.
- To be eligible to make a Claim, you must have received a notice letter of the Data Incident that occurred in February 2025.
- Eligible Claimants under the Settlement Agreement will be eligible to receive one of the following Settlement Benefits:

❖ **Documented Loss:** Documented, monetary losses incurred by a Settlement Class Member, and which specifically involve (a) an actual, documented, and unreimbursed monetary expense; (b) that was more likely than not caused by the Data Breach; and (c) where the claimant made reasonable efforts to avoid or seek reimbursement for, the expense. A Documented Loss must be supported by Reasonable Documentation that a Settlement Class Member actually incurred unreimbursed out-of-pocket expenses and are subject to review and approval by the Settlement Administrator. Any Documented Loss must include a declaration under penalty of perjury executed by the Settlement Class Member submitting the Documented Loss, that the

statements, representations, and/or documentation submitted in support of the Documented Loss are true and correct to the best of the Settlement Class Member's knowledge. Class Members who believe they suffered a Documented Loss as a result of the Data Incident may request up to \$5,000 for the reimbursement of losses which are sufficiently documented. If you make a claim for a Documented Loss, you may also make a Claim for Credit Monitoring as described below; or

- ❖ **Alternative Cash Payment:** A onetime cash payment of \$45.00 in lieu of a Cash Payment for Documented Loss and/or Credit Monitoring; or
- ❖ **Credit Monitoring:** Three (3) years credit monitoring offered by CyEx with one (1) major credit bureau (Experian, Equifax, or TransUnion), which will include, at least identity theft insurance up to \$1,000,000, without deductible.

- For more information or to submit a Claim, go online www.CommunicationsDataGroupSettlement.com or call 1-(866)-601-3534.
- Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive payment or other Settlement Benefits.	Submitted or Postmarked on or Before November 10, 2026
Exclude Yourself By Opting Out of the Class	Receive no Alternative Cash Payment, Credit Monitoring, Cash Payment for Documented Losses, or other Settlement Benefits. This is the only option that allows you to keep your right to bring any other lawsuit against Defendants for the same claims if you are a Class Member.	Submitted or Postmarked on or Before October 26, 2026
Object to the Settlement and/or Attend the Fairness Hearing	You can write the Court about why you agree or disagree with the Settlement. The Court cannot order a different Settlement. You can also ask to speak to the Court at the Final Approval Hearing on November 16, 2026 , about the fairness of the Settlement, with or without your own attorney.	Received on or Before October 26, 2026
Do Nothing	Receive nothing. Give up your legal rights if you are a Class Member.	No Deadline.

- Your rights and options as a Class Member – and the deadlines to exercise your rights – are

- explained in this Notice.
- The Court will still have to decide whether to approve the Settlement. Payments to Class Members will be made if the Court approves the Settlement and after any possible appeals are resolved.

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BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give “final approval” to the Settlement. This Notice explains the nature of the Action that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Honorable Jason B. Bohm, of the Circuit Court for Champaign County, Illinois is overseeing this Action captioned as *Pierce, et al. vs. Communications Data Group, Inc. et al.*, Case No. 2026CH000032. The people who brought the Action, Shannon Pierce, Michelle Watson, Rilda Firkins, Briana Acuna, Michael Daniell, Cara Haenel, and Deborah Ware, are called the Plaintiffs. The entities being sued, Communications Data Group, Inc., Duo County Telephone Cooperative Corporation, Inc., Cumberland Cellular, LLC, and Home Wireless, Inc., are called the Defendants.

2. What is this Action about?

The Action claims that Defendants were responsible for the Data Incident and asserts claims for negligence, negligence per se, breach of implied contract, breach of third-party beneficiary contract, unjust enrichment, and declaratory judgement.

Defendants deny these claims and claim they did not do anything wrong. No court or other judicial entity has made any judgment or other determination that Defendants have any liability for these claims or did anything wrong.

3. Why is this Action a class action?

In a class action, one or more people called Class Representatives sue on behalf of all people who have similar claims. Together, all of these people are called a Class, and the individuals in the Class are called Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing Settlement Benefits to Class Members. The Class Representatives appointed to represent the Class and the attorneys for the Class (“Class Counsel,” see Question 18) think the Settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are affected by the Settlement and potentially a Class Member if you reside in the United States and your Private Information was potentially impacted by the Data Incident, including if you were mailed a notification by or on behalf of the Defendants, regarding the Data Incident (the “Settlement Class”).

Only Class Members are eligible to receive Settlement Benefits under the Settlement. Specifically excluded from the Settlement Class are (a) all persons who are employees, directors, officers, and agents of Defendants, or their respective subsidiaries and affiliated companies; (b) governmental entities; and (c) the Judge(s) assigned to the Action and their immediate family, and Court staff.

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-(866)-601-3534 with questions. You may also write with questions to:

Communications Data Group Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

www.CommunicationsDataGroupSettlement.com

THE SETTLEMENT BENEFITS – WHAT YOU RECEIVE IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides that Defendant Communications Data Group, Inc. will fund the following benefits: up to \$5,000.00 for reimbursement of a Documented Loss. Class Members that submit a Claim for a Documented Loss may also submit a claim for Credit Monitoring which

includes three years of credit monitoring offered by CyEx, with one major credit bureau, which includes identity theft insurance of up to \$1,000,000. In lieu of the previous Settlement Benefits, a Class Member may instead submit a Claim for an Alternate Cash Payment of \$45 or for Credit Monitoring alone.

Payment of (1) attorneys' fees and expenses and Service Awards to Plaintiffs (see Question 19) and (2) the costs of notifying the Class and administering the Settlement will also be paid by Defendant Communications Data Group, Inc.

Also, as part of the Settlement, Defendant Communications Data Group, Inc. has either undertaken or will undertake certain Business Improvements to further secure its systems and environments.

8. What payments or Settlement Benefits are available for reimbursement under the Settlement?

Class Members who submit a Claim are eligible to receive a Cash Payment for Documented Losses, an Alternative Cash Payment, or Credit Monitoring, all of which are described below:

- a) Cash Payment for Documented Losses resulting from the Data Incident (up to \$5,000.00 in total). This shall include, without limitation, and by way of example the following incurred on or after February 2025:
 - expenses associated with fraud or identity theft stemming from the Data Incident;
 - 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 mailing of the notice of data breach, through the date of claim submission; and
 - miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

Individuals selecting Cash Payment for Documented Losses may also receive Credit Monitoring (see below).

- b) An Alternative Cash Payment of \$45 in lieu of both a Cash Payment for Documented Loss and/or Credit Monitoring.
- c) Three (3) years of Credit Monitoring offered by CyEx with one (1) major credit bureau (Experian, Equifax, or TransUnion), which will include, at least identity theft insurance up to \$1,000,000, without deductible.

I. HOW DO YOU SUBMIT A CLAIM?

9. How do I get a Settlement Benefit?

To receive a Settlement Benefit under the Settlement, you must complete and submit a Claim for that benefit (a “Claim”). Every Claim must be made on a form (“Claim Form”) available at www.CommunicationsDataGroupSettlement.com or by calling 1-(866)-601-3534.

10. How will Claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is a Valid Claim. The Settlement Administrator may require additional information. If this is the case, you will be sent a Notice of Deficiency. If you do not provide the additional information in a timely manner, then the Claim will be considered invalid and will not be paid.

11. When will I get my payment?

The Court will hold a Final Approval Hearing on **November 16, 2026, at 10:30 a.m. CT** to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving those can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Please be patient.

II. WHAT DO DEFENDANTS GET?

12. What am I giving up as part of the Settlement?

The Defendants get a Release from all claims covered by this Settlement. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Class Member and you will give up your right to sue the Defendants and other persons (“Released Parties”) as to all claims arising out of or relating to the Data Incident (“Released Claims”). This Release is described in the Settlement Agreement, which is available at www.CommunicationsDataGroupSettlement.com. If you have any questions you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

III. EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of this Settlement, then you must take steps to exclude yourself from the Class. This is sometimes referred to as “opting out” of the Class.

13. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not be entitled to receive any Settlement Benefits from the Settlement, but you will not be bound by any judgment in this case.

14. If I do not exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants (and any other Released Parties) for the claims that this Settlement resolves. You must exclude yourself

from the Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

15. How do I exclude myself from the Settlement?

To exclude yourself, send a letter to the Settlement Administrator that says you want to be excluded from or opt-out of the Settlement in *Pierce, et al. vs. Communications Data Group, Inc., et al.*, No. 2026CH000032, Circuit Court of Champaign County, Illinois. The letter must: (a) state your name, address, and telephone number; (b) contain your personal signature or the personal signature of a person authorized by law to act on your behalf; and (c) a statement indicating a request to be excluded from the Settlement Class. You must mail your exclusion or opt-out request postmarked by **October 26, 2026**, to:

Communications Data Group Settlement
c/o Settlement Administrator
Attn: Exclusion Request
PO Box 25226
Santa Ana, CA 92799-9958

IV. OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I do not like the Settlement?

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. The Court will consider your views in its decision on whether to approve the Settlement. The Court can only approve or deny the Settlement and cannot change its terms. To object, you must mail your objection to the Settlement Administrator at the mailing address listed below and file your objection with the Court, postmarked by **no later** than the Objection Deadline, **October 26, 2026**:

Communications Data Group Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

Your objection must be written and must include all of the following: (1) the objector's full name, mailing address, telephone number, and email address (if any); (2) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel; (3) the number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case; (4) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or the Motion for Attorneys' Fees, Costs, and Service Awards, and whether they will appear at the Final Approval Hearing; (5) the number of times in which the objector's counsel and/or the

objector's counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling on the objection issued by the trial and appellate courts in each such listed case; (6) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any); (7) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; (8) all exhibits to be introduced into evidence at the Final Approval Hearing, which must also be attached to, or included with, the written objection; and (9) the objector's signature (an attorney's signature is not sufficient).

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

Objecting is telling the Court that you do not like the Settlement and explains why you do not think it should be approved. You can object only if you are a Class Member. Excluding yourself is telling the Court that you do not want to be part of the Class and do not want to receive any Settlement Benefits from the Settlement. If you exclude yourself, then you have no basis to object because you are no longer a Class Member and the Action no longer affects you. If you submit both a valid objection and a valid request to be excluded, you will be deemed to have only submitted the request to be excluded.

V. THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed the following attorneys as Class Counsel to represent the Class:

Raina Borrelli
Strauss Borrelli PLLC
980 N. Michigan Avenue, Suite 1610
Chicago, Illinois 60611
Raina@straussborrelli.com

Gary Klinger
Milberg Coleman Bryson Phillips Grossman LLC
227 W. Monroe Street, Suite 2100
Chicago, Illinois 60606
gklinger@milberg.com

William B. Federman
Federman & Sherwood
10205 North Pennsylvania Avenue
Oklahoma City, OK 73120
info@federmanlaw.com

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

19. How will the lawyers be paid?

Class Counsel will ask the Court for an award for attorneys' fees up to \$500,000, including reasonable litigation expenses. Defendants have agreed not to object to any award of attorneys' fees and expenses up to that amount, to the extent they are approved by the Court. This payment for any attorneys' fees and expenses to Class Counsel will be made by Defendant Communications Data Group, Inc. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Class Counsel will also ask the Court for Service Awards up to \$2,500 for each of the Class Representatives for their services in representing the Class in this matter.

Any award for attorneys' fees and expenses for Class Counsel and the Class Representative Service Awards must be approved by the Court. The Court may award less than the amount requested. Class Counsel's Motion for Final Approval of the Settlement will be filed no later than **November 2, 2026**, and their Motion for Attorneys' Fees, Costs and Service Awards will be filed no later than **October 12, 2026**, and will be posted on the Settlement Website.

VI. THE COURT'S FINAL APPROVAL HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at **10:30 am. CT on November 16, 2026**, at the Circuit Court of the 6th Judicial Circuit Champaign County, Illinois 101 E. Main St., Urbana, IL 61801, **Courtroom C** or by remote or virtual means as ordered by the Court. At this Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, then 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 Motion for Attorneys' Fees, Costs and Service Awards. After the Final Approval 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 Class Counsel recommend checking www.CommunicationsDataGroupSettlement.com or calling 1-(866)-601-3534.

21. Do I have to attend the Final Approval Hearing?

No. Class Counsel will be 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 visit the Court to discuss it. As long as you filed and submitted your valid objection pursuant to the instructions laid out in Question 16 and included in the Settlement Agreement the Court will consider it.

22. May I speak at the Final Approval Hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so,

you must have filed and submitted your valid objection pursuant to the instructions laid out in Question 16 and included in the Settlement Agreement

VII. IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing you will not get any money or other benefit from this Settlement. If the Settlement is granted final approval and the judgment becomes final, then you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendants and the other Released Parties based on any of the Released Claims related to the Data Incident, ever again.

VIII. GETTING MORE INFORMATION

24. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at www.CommunicationsDataGroupSettlement.com. You may also call the Settlement Administrator with questions or to receive a Claim Form at 1-(866)-601-3534.

This Notice is approved by the Circuit Court for Champaign County, Illinois. **DO NOT CONTACT THE COURT DIRECTLY IF YOU HAVE QUESTIONS ABOUT THE SETTLEMENT.** Please contact the Settlement Administrator or Class Counsel if you have any questions about the Settlement.