

THE SUPERIOR COURT DIVISION OF THE GENERAL COURT OF JUSTICE FOR  
MOORE COUNTY NORTH CAROLINA

**Notice to current and former patients of Marlboro-  
Chesterfield Pathology, P.C.: You could receive benefits from  
a class action settlement.**

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

- The Marlboro-Chesterfield Pathology, P.C. (the “Defendant” or “MCP”) has agreed to pay either up to \$1,000 (one thousand dollars) per Settlement Class Member for proven monetary losses arising from financial fraud or identity theft or \$10 (ten dollars) in the alternative to receiving compensation for Documented Ordinary and Documented Extraordinary Losses for Settlement Class Members who submit a Claim because their Social Security Number was compromised in the Data Incident; to provide the opportunity for Settlement Class Members to enroll in a one-year membership of 3B Credit Monitoring with at least \$1,000,000 (one million dollars) in fraud protection; and to pay up to \$100,000 (one hundred thousand dollars) in attorneys’ fees and costs to resolve the claims of a Settlement Class of patients whose personally identifiable information or protected health information (“PII/PHI”) was maintained on Defendant’s systems that were compromised as a result of the breach announced by Defendant on or around May 22, 2025.
- The Settlement resolves a class action lawsuit alleging that MCP failed to properly secure and safeguard sensitive and confidential PII/PHI, including names, dates of birth, Social Security numbers and PHI of its current and former patients. MCP denies any and all alleged wrongdoing.
- The Settlement avoids the costs and risks of continuing the lawsuit (such as going to trial, losing, and getting nothing); pays money to patients like you; and releases your claims against MCP.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:</b>	
<b>DO NOTHING</b>	You will not receive any Settlement Class Member Benefit from this class action Settlement, but will remain a Settlement Class Member and be bound by the Releases.
<b>EXCLUDE YOURSELF</b>	Get no payment, exclude yourself from the Settlement Class, and preserve your ability to file suit over the claims at issue in this action in your individual capacity and at your own expense.
<b>SUBMIT A CLAIM FORM</b>	The only way to receive a Settlement Class Member Benefit from the Settlement.
<b>OBJECT</b>	You have a right to stay in the Settlement Class and argue to the Court that the settlement should not be approved.
<b>GO TO A HEARING</b>	Ask to speak in Court about the Settlement.

- Your legal rights are affected whether you act, or don’t act. Read this Notice carefully.

Questions? Call (833) 930-1155 or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

## WHAT THIS NOTICE CONTAINS

<b>BASIC INFORMATION</b>	3
1. Why did I get this Notice?	3
2. What is this lawsuit about?	3
3. Why is this a class action, and who is involved?	3
4. Why is there a Settlement?	3
<b>WHO IS IN THE CLASS ACTION LAWSUIT?</b>	4
5. How do I know if I am part of the Settlement?	4
6. I'm still not sure if I am included	4
7. What does the Settlement provide?	4
8. How much will my payment be?	4
<b>HOW YOU GET A SETTLEMENT CLASS MEMBER BENEFIT</b>	5
9. How can I get a Settlement Class Member Benefit?	5
10. When will I get my Settlement Class Member Benefit?	5
11. What am I giving up as part of the Settlement?	5
<b>EXCLUDING YOURSELF FROM THE ONGOING LAWSUIT</b>	5
12. How do I exclude myself from the Settlement Class and the Settlement?	5
13. If I don't exclude myself, can I sue MCP for the same thing later?	6
14. If I exclude myself, can I get a Settlement Class Member Benefit?	6
<b>THE LAWYERS REPRESENTING YOU</b>	6
15. Who represents me in this case?	6
16. Should I get my own lawyer?	6
17. How will the lawyers be paid?	6
<b>OBJECTING TO THE SETTLEMENT</b>	6
18. Can I object to the Settlement?	6
19. What's the difference between objecting and excluding?	8
<b>THE COURT'S FINAL APPROVAL HEARING (ALSO CALLED FAIRNESS HEARING)</b>	8
20. When and where will the Court decide whether to approve the Settlement?	8
21. Do I have to come to the hearing?	8
22. May I speak at hearing?	8
<b>IF YOU DO NOTHING</b>	8
23. What happens if I do nothing at all?	8
<b>GETTING MORE INFORMATION</b>	9
24. Are more details about the lawsuit available?	9
25. How do I get more information?	9

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## BASIC INFORMATION

### 1. Why did I get this Notice?

You may have received a Notice because MCP's records show that you were a former or current patient of MCP whose PII, including names, dates of birth, Social Security numbers and PHI was exposed in the data breach MCP announced on or about May 22, 2025.

**The Court sent you a Notice because you have a right to know about a proposed Settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the Settlement. If the Court approves it and after objections and appeals are resolved, an administrator appointed by the Court ("Settlement Administrator") will make the payments that the Settlement allows. You will be informed of the progress of the Settlement.**

This package explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Superior Court Division of the General Court of Justice of Moore County, North Carolina, and the case is known as *Cox v. Marlboro-Chesterfield Pathology, P.C.*, Case No. 25CV001289-620. The individual who sued is called the Plaintiffs, and the entity they sued, Marlboro-Chesterfield Pathology, P.C., is called the Defendant.

### 2. What is this lawsuit about?

The lawsuit claims that MCP failed to properly secure and safeguard PII, including names, dates of birth, Social Security numbers and PHI of its current and former patients. Defendant's wrongful disclosure has harmed Plaintiff and the Classes, which include nearly 235,000 people.

To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at: [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

### 3. Why is this a class action, and who is involved?

In a class action lawsuit, one or more people called "Named Plaintiffs" or "Class Representatives" (in this case, Christine Cox) sued on behalf of other people who have similar claims. All these similarly situated people make up a "Settlement Class" and those similar people are called "Settlement Class Members." A court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

### 4. Why is there a Settlement?

The Named Plaintiffs and MCP have exchanged a significant amount of information in a process called discovery. MCP argues that it is not negligent. An expert witness retained by the Plaintiffs disagrees. Instead of going to trial, both sides agreed to a Settlement. That way, they avoid the cost of a trial, the risk to both sides, and Settlement Class Members will be guaranteed compensation. The named Plaintiff and their attorney think the Settlement is preferable to the risks and further costs of trial.

## WHO IS IN THE CLASS ACTION SETTLEMENT

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

The Named Plaintiffs and MCP have decided that everyone who fits this description is a Settlement Class Member:

All living individuals residing in the United States whose PII/PHI was maintained on Defendant's systems that were compromised as a result of the breach announced by Defendant on or around May 22, 2025.

Excluded from the Settlement Class are (a) all persons who are directors and officers of Defendant; (b) governmental entities; (c) the Judge assigned to the Action, that Judge's immediate family, and Court staff; and all individuals who make a timely election to be excluded from the Settlement Class.

You are a Settlement Class Member covered by this Settlement if you fall under the definition above and do not request exclusion pursuant to the instructions below.

### 6. I'm still not sure if I am included.

If you received a Notice mailed to you, it is because you were listed as a potential Settlement Class Member. If you are still not sure whether you are included, you can ask for free help. You can call (833) 930-1155 or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com) for more information.

### 7. What does the Settlement provide?

MCP has agreed to pay up to up to \$1,000 (one thousand dollars) per Settlement Class Member for proven monetary losses arising from financial fraud or identity theft; \$10 (ten dollars) in the alternative to receiving Compensation for Documented Losses for Settlement Class Members who submit a Claim because their Social Security Number was compromised in the Data Incident; the opportunity for Settlement Class Members to enroll in a one-year membership of 3B Credit Monitoring with at least \$1,000,000 (one million dollars) in fraud protection; and up to \$100,000 (one hundred thousand dollars) in attorneys' fees and costs.

### 8. How much will my payment be?

Depending on your particular circumstances you might receive up to:

- \$1,000 (one thousand dollars) per Settlement Class Member for proven monetary losses arising from financial fraud or identity theft;
- \$10 (ten dollars) in the alternative to receiving Compensation for Documented Losses for Settlement Class Members who submit a Claim because their Social Security Number was compromised in the Data Incident;
- The opportunity for Settlement Class Members to enroll in a one-year membership of 3B Credit Monitoring with at least \$1,000,000 (one million dollars) in fraud protection.

Questions? Call (833) 930-1155 or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

## HOW YOU GET A SETTLEMENT CLASS MEMBER BENEFIT

### 9. How can I get a Settlement Class Member Benefit?

To receive a Settlement Class Member Benefit, you must complete and submit a Claim Form online at [www.m-cpsettlement.com](http://www.m-cpsettlement.com) or by mail to Settlement Administrator - 83419, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324. Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by **August 21, 2026** or by mail postmarked by **August 21, 2026**.

### 10. When will I get my Settlement Class Member Benefit?

The Court will hold a hearing on **October 12, 2026**, to decide whether to approve the Settlement. If approved, the Settlement becomes final and the Settlement Administrator will be directed to send benefits promptly. You may check the website ([www.m-cpsettlement.com](http://www.m-cpsettlement.com)) or call (833) 930-1155 for updates or questions.

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

Defendant and its affiliates will receive a Release from all claims that could have been or that were brought against Defendant relating to the Data Incident. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant and each entity which is controlled by, controlling or under common control with Defendant and their respective past, present, and future direct and indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, insurers, reinsurers, divisions, officers, directors, shareholders, members, agents, servants, employees, partners, predecessors, successors, managers, administrators, executors, and trustees, in its capacity as such and assigns of each of them as well as covered entities associated with the Data Incident. These Releases are described in Section XI of the Settlement Agreement, which is available at [www.m-cpsettlement.com](http://www.m-cpsettlement.com). If you have any questions, you can talk to Class Counsel listed in Question 15 for free or you can talk to your own lawyer.

## EXCLUDING YOURSELF FROM THE ONGOING LAWSUIT

If you don't want a payment from this Settlement, but you want to keep the right to sue or continue to sue MCP on your own and at your own expense about the legal issues in this case, then you must take steps to exclude yourself (also called "opting out"), see below.

### 12. How do I exclude myself from the Settlement Class and the Settlement?

To exclude yourself from the Settlement Class and the Settlement, you must send a letter by mail saying that you want to be excluded from *Cox v. Marlboro-Chesterfield Pathology, P.C.*, Case No. 25CV001289-620. Be sure to include your name, address, telephone number, email address (if any), signature, and a statement that you wish to be excluded from the Settlement.

You must mail your opt-out request postmarked no later than **August 21, 2026** to:

Settlement Administrator – 83419  
c/o Kroll Settlement Administration, LLC  
P.O. Box 5324  
New York, NY 10150-5324

Questions? Call (833) 930-1155 or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

You cannot opt out by telephone. If you opt out, you will not get any Settlement Class Member Benefit, and you cannot object to the Settlement. You will not be bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) MCP for the allegations in this case in the future with your own lawyer and at your own expense.

**13. If I don't exclude myself, can I sue MCP for the same thing later?**

No. Unless you exclude yourself, you are a Settlement Class Member, and you give up your right to sue MCP for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from this Settlement Class to continue your own lawsuit. Remember, the Opt-Out Deadline is **August 21, 2026**.

**14. If I exclude myself, can I get a Settlement Class Member Benefit?**

No. If you exclude yourself, you will NOT receive a Settlement Class Member Benefit from this Settlement. But you may sue, continue to sue, or be part of a different lawsuit against MCP.

## **THE LAWYERS REPRESENTING YOU**

**15. Who represents me in this case?**

The following law firm and lawyers have been appointed as Class Counsel to represent the Class: Paul Doolittle of Poulin Willey Anastopoulos, LLC.

This law firm is called "Class Counsel." If you want to be represented by your own lawyer, you may hire one at your own expense.

**16. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you may ask your lawyer to appear in Court for you. You may also appear for yourself without a lawyer.

**17. How will the lawyers be paid?**

The lawyers' fees and litigation costs are paid separately by Defendant; they do not reduce the amount paid to Settlement Class Members or Settlement Administration Costs.

## **OBJECTING TO THE SETTLEMENT**

You can tell the Court that you don't agree with the Settlement or some part of it.

**18. Can I object to the Settlement?**

You can tell the Court that you do not agree with the Settlement, and/or Application for Attorneys' Fees, Costs, and Service Awards or some part of it by objecting to the Settlement. Objections must be filed with the Court, and sent by U.S. Mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator at the addresses listed below, **postmarked by no later than August 21, 2026**.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of Court Monroe County Courthouse 1416 Carthage Street Carthage, NC 28327	Settlement Administrator - 83419 c/o Kroll Settlement Administration LLC P.O. Box 5324 New York, NY 10150-5324
<b>Class Counsel</b>	<b>Defendant's Counsel</b>
Paul Doolittle <b>POULIN   WILLEY</b> <b>  ANASTOPOULO</b> 32 Ann Street Charleston, SC 29403 Telephone: (803) 222-2222 Fax: (843) 494-5536 Paul.doolittle@poulinwilley.com	H. Hunter Bruton David A. Senter <b>Smith Anderson Blount Dorsett</b> <b>Mitchell &amp; Jernigan, L.L.P.</b> Post Office Box 2611 Raleigh, NC 27602-2611 hbruton@smithlaw.com dsenter@smithlaw.com

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

- a. the objector's full name, mailing address, telephone number, and email address (if any);
- b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- c. 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;
- d. 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 Application for Attorneys' Fees, Costs, and Service Award;
- e. the number of times in which the objector's counsel and/or 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 upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's 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 the objector, and whether they 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 the objection (if any);
- h. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- i. the objector's signature (an attorney's signature is not sufficient).

Questions? Call (833) 930-1155 or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

If submitted by mail, an objection shall be deemed to have been submitted when posted if received with a postmark date indicated on the envelope if mailed first-class postage prepaid and addressed in accordance with the instructions. If submitted by private courier (e.g., Federal Express), an objection shall be deemed to have been submitted on the shipping date reflected on the shipping label.

**19. What's the difference between objecting and excluding?**

Objecting is simply telling the Court that you don't like the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you don't 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, and you will not receive any Settlement Class Member Benefit from the Settlement.

**THE COURT'S FINAL APPROVAL HEARING**

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak if you submit a written objection, but you don't have to.

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

The Court will hold a Final Approval Hearing on **October 12, 2026**, at the Moore County Courthouse, 1416 Carthage St, Carthage, North Carolina 28327. At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Judge will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

**21. Do I have to come to the hearing?**

No. Class Counsel will answer questions the Judge may have, but you are welcome to come. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also hire your own lawyer to attend, but it is not necessary.

**22. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing if you submitted a written objection and included with your objection a written statement of your intent to appear at the hearing.

**IF YOU DO NOTHING**

**23. What happens if I do nothing at all?**

If you do nothing, you will not receive any Settlement Class Member Benefits from the Settlement. If the Settlement is granted Final Approval and becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or the other Released Parties based on any claim that could have been or that was brought relating to the Data Incident.

## GETTING MORE INFORMATION

### 24. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement. More details are in a Settlement Agreement. You can get a copy of the Settlement Agreement by visiting [www.m-cpsettlement.com](http://www.m-cpsettlement.com).

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

You can call (833) 930-1155; write to the Settlement Administrator – 83419 c/o Kroll Settlement Administration, LLC, PO Box 5324, New York, NY 101505324; or visit [www.m-cpsettlement.com](http://www.m-cpsettlement.com), where you will find answers to common questions about the Settlement and other information to help you determine whether you are a Settlement Class Member and whether you are eligible for a payment. You may also contact Class Counsel with questions (see contact information in Question 18, above). You may also seek the advice and counsel of your own attorney at your own expense, if you desire.

PLEASE DO NOT CONTACT THE COURT. YOU SHOULD DIRECT ANY QUESTIONS YOU MAY HAVE ABOUT THIS NOTICE OR THE SETTLEMENT TO THE SETTLEMENT ADMINISTRATOR AND/OR TO CLASS COUNSEL.