

## NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

### **If Drug and Alcohol Treatment Services, Inc (“Defendant” or “DATS”) Notified You of a Data Breach Incident, You May be Eligible For Benefits From a Class Action Settlement.**

*This is not a solicitation from a lawyer, junk mail, or an advertisement. A court authorized this Notice.*

- A proposed Settlement has been reached in a class action lawsuit known as *Leo Woytach, et al v. Drug and Alcohol Treatment Services, Inc.*, Case No. 2025-CV-03681 (“Lawsuit”), filed in the Court of Common Pleas of Lackawanna County, Pennsylvania.
- This Lawsuit arises out of unauthorized access to Defendant’s systems where certain files resided containing sensitive and/or Protected Health Information including, but not limited to, patient names, addresses, dates of birth, social security numbers, health insurance information, patient account numbers, medication information, diagnosis and treatment information, doctors’ names, and medical claims and billing information (collectively Protected Health Information “PHI”) between October 5, 2024 and October 6, 2024 (the “Data Breach”). Defendant disagrees with Plaintiff’s claims and denies any wrongdoing.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) up to \$5,000.00 for documented out-of-pocket expenses **OR** (2) an alternate flat cash payment that will increase or decrease *pro rata* depending on the aggregate dollar amount of Valid Claims submitted. Additionally, all Settlement Class Members may elect to receive (1) one year of medical identity theft monitoring through CyEx.
- You are included in this Settlement as a Settlement Class Member if you were mailed written notification that indicated your Protected Health Information was potentially compromised as a result of the Data Breach between October 5, 2024 and October 6, 2024.
- Your legal rights are affected regardless of whether you do or do not act. Read this Notice carefully.

### **YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT**

<b>Submit a Claim</b>	<p><b>You must submit a Valid Claim to get money from this Settlement.</b></p> <p>Claim Forms must be submitted online by September 24, 2026, if mailed, postmarked no later than September 24, 2026.</p>
<b>Exclude Yourself</b>	<p><b>Get out of the Settlement. Get no money. Keep your rights.</b></p> <p>This is the only option that allows you to keep your right to sue about the claims in this lawsuit. You will not get any money from the Settlement.</p> <p>Your request to exclude yourself must be postmarked no later than August 25, 2026.</p>
<b>File an Objection</b>	<p>Stay in the Settlement but tell the Court why you think the Settlement should not be approved.</p> <p>Objections must be postmarked no later than August 25, 2026.</p>
<b>Go to a Hearing</b>	<p>You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details.</p> <p>The Final Approval Hearing is scheduled for November 24, 2026.</p>

**WHAT THIS NOTICE CONTAINS**

**Basic Information..... Pages 3-4**

1. How do I know if I am affected by the lawsuit and Settlement?
2. What is this case about?
3. Why is there a Settlement?
4. Why is this a class action?
5. How do I know if I am included in the Settlement?

**The Settlement Benefits..... Pages 4-5**

6. What does this Settlement provide?
7. How to submit a Claim?
8. What am I giving up as part of the Settlement?
9. Will the Class Representative receive compensation?

**Exclude Yourself ..... Page 5-6**

10. How do I exclude myself from the Settlement?
11. If I do not exclude myself, can I sue later?
12. What happens if I do nothing at all?

**The Lawyers Representing You ..... Page 6**

13. Do I have a lawyer in the case?
14. How will the lawyers be paid?

**Objecting to the Settlement..... Page 6-7**

15. How do I tell the Court that I do not like the Settlement?
16. What is the difference between objecting and asking to be excluded?

**The Final Approval Hearing..... Page 7-8**

17. When and where will the Court decide whether to approve the Settlement?
18. Do I have to come to the hearing?
19. May I speak at the hearing?

**Do Nothing..... Page 8**

20. What happens if I do nothing?

**Get More Information ..... Page 8**

21. How do I get more information about the Settlement?

## BASIC INFORMATION

### 1. How do I know if I am affected by the Lawsuit and Settlement?

You are a Settlement Class Member if you were mailed written notification by Drug and Alcohol Treatment Services, Inc. (“Defendant” or “DATS”), on or around May 2, 2025, that your Protected Health Information was potentially compromised as a result of the Data Breach between October 5, 2024 and October 6, 2024.

The Settlement Class specifically excludes: (i) Drug and Alcohol Treatment Services, Inc. (“Defendant”), the Related Entities, and their officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) any other 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 Breach or who pleads *nolo contendere* to any such charge. This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

### 2. What is this case about?

This case is known as *Leo Woytach, et al v. Drug and Alcohol Treatment Services, Inc.*, Case No. 2025-CV-03681 (“Lawsuit”), filed in the Court of Common Pleas of Lackawanna County, Pennsylvania. The person who sued is called the “Plaintiff” and the company they sued, Drug and Alcohol Treatment Services, Inc., known as the “Defendant” in this case.

Plaintiff filed a lawsuit against Defendant, individually, and on behalf of anyone whose Protected Health Information was potentially impacted as a result of the Data Breach.

This Lawsuit arises out of unauthorized access to Defendants’ systems where certain files resided containing sensitive and/or Protected Health Information including, but not limited to, patient names, addresses, dates of birth, social security numbers, health insurance information, patient account numbers, medication information, diagnosis and treatment information, doctors’ names, and medical claims and billing information (collectively “Protected Health Information ”). After learning of the Data Breach, while the investigation was ongoing, DATS provided notice of the incident via a posting on its website on December 5, 2024. DATS subsequently provided written notice of the incident to the potentially affected individuals on or around May 2, 2025. Subsequently, this lawsuit was filed asserting claims against DATS relating to the Data Breach. Defendant denies Plaintiff’s claims and denies any wrongdoing.

### 3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representative, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class Members. The Court did not decide in favor of the Plaintiff or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com).

### 4. Why is this a class action?

In a class action, one or more people called a “Class Representative” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.”

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

You are included in the Settlement if you were mailed written notification by Drug and Alcohol Treatment Services, Inc. (“Defendant” or “DATS”) on or around May 2, 2025 that your Protected Health Information was potentially compromised as a result of the Data Breach between October 5, 2024 and October 6, 2024. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com), call toll free 1-866-742-4955, send an email to [DATSDataBreachSettlement@RG2Claims.com](mailto:DATSDataBreachSettlement@RG2Claims.com), or write to DATS Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

## THE SETTLEMENT BENEFITS

### 6. What does this Settlement provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

#### Expense Reimbursement

**Documented Out of Pocket Expense Reimbursement (Cash Payment A):** All Settlement Class Members who submit a Valid Claim using the Claim Form are eligible for the following documented out-of-pocket expenses, not to exceed \$5,000 per Settlement Class Member, that were incurred as a result of the Data Breach: (i) unreimbursed bank fees; (ii) long distance phone charges; (iii) cell phone charges (only if charged by the minute); (iv) data charges (only if charged based on the amount of data used); (v) postage; (vi) gasoline for local travel; and (vii) fees for credit reports, credit monitoring, or other identity theft insurance products purchased by Settlement Class Members between October 2024 and the Claims Deadline. To receive reimbursement for any of the above-referenced out-of-pocket expenses, Settlement Class Members must submit a valid and timely claim, including necessary supporting documentation, to the Settlement Administrator.

**Alternate Cash Payment (Cash Payment B):** As an alternative to Cash Payment A, a Settlement Class Member may elect to receive Cash Payment B, which is a flat cash payment. As described hereinbelow, the amount will increase or decrease *pro rata* depending on the aggregate dollar amount of Valid Claims submitted.

*(You cannot file a claim for Out-of-Pocket Expenses if you claim the Alternate Cash Payment.)*

**Medical Monitoring:** In addition to Cash Payment A or Cash Payment B, Settlement Class Members may also make a Claim for Medical Monitoring that will include one year of a medical identity theft protection through CyEx Medical Shield. The Medical Monitoring benefit will be available to Settlement Class Members regardless of whether they took advantage of any previous offering of credit monitoring from DATS. Individuals who elected to utilize a previous offering of credit monitoring from DATS, or who obtained credit monitoring services from another provider as a result of the Data Breach, will be permitted to postpone activation of their Medical Monitoring benefit for up to twelve (12) months.

### 7. How to submit a claim?

All claims will be reviewed by the Settlement Administrator. You must file a Claim Form to get any money from the proposed Settlement. Claim Forms must be submitted online by **September 24, 2026** or postmarked no later than **September 24, 2026**. You can download a Claim Form at [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com), send an email to [DATSDataBreachSettlement@RG2Claims.com](mailto:DATSDataBreachSettlement@RG2Claims.com), or you can call the Settlement Administrator at 1-866-742-4955. The unique Class Member ID and Pin Code that were printed on the Notice you received will be required to access the online and paper claim forms.

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

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue Defendant and its Related Entities and each of their past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of their respective predecessors, successors, directors, officers, principals, agents, attorneys, insurers, and reinsurers regarding the claims in this case. The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Persons, is available at [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com).

The only way to keep the right to sue is to exclude yourself (*see* Question 10), otherwise you will be included in the Settlement Class, if the Settlement is approved, and you give up the right to sue for the claims in this case.

## **9. Will the Class Representative receive compensation?**

Yes. The Class Representatives will receive a service award of up to \$2,000 each, to compensate them for their services and efforts in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Class Representative.

### **EXCLUDE YOURSELF**

## **10. How do I exclude myself from the Settlement?**

If you do not want to be included in the Settlement, you must send a timely written request for exclusion. Your request for exclusion must be individually signed by you. Your request must clearly manifest your intent to be excluded from the Settlement.

Your written request for exclusion must be postmarked no later than **August 25, 2026** to:

DATS Settlement  
c/o RG/2 Claims Administration LLC  
P.O. Box 59479  
Philadelphia, PA 19102-9479

Instructions on how to submit a request for exclusion are available at [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com) or from the Settlement Administrator by calling 1-866-742-4955.

If you exclude yourself, you will not be able to receive any cash benefits from the Settlement and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit and you will keep your right to sue the Defendant on your own for the claims that this Settlement resolves.

## **11. If I do not exclude myself, can I sue later?**

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Persons (listed in Question 8) for the claims this Settlement resolves.

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

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any money from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled claims in this case at any time.

### **THE LAWYERS REPRESENTING YOU**

## **13. Do I have a lawyer in the case?**

Yes. The Court has appointed Kenneth J. Grunfeld of the law firm of Kopelowitz Ostrow P.A. and Samantha E. Holbrook of the law firm of Shub Johns & Holbrook LLP (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. 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.

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

Class Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed \$183,000, plus reasonable litigation Costs and Expenses. A copy of Class Counsel’s Application for Attorneys’ Fees, Costs, and Expenses will be posted on the Settlement Website, [www.DATSDataBreachSettlement.com](http://www.DATSDataBreachSettlement.com), before the Final Approval Hearing. The Court will make the final decisions as to the amounts to be paid to Class Counsel, and may award less than the amount requested by Class Counsel.

### **OBJECTING TO THE SETTLEMENT**

## **15. How do I tell the Court that I do not like the Settlement?**

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you can submit an objection telling it why you do not think the Settlement should be approved. Objections must be submitted in writing and include all the following information:

Such notice shall state:

- 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 5 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 5 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 5 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 the objector's signature (an attorney's signature is not sufficient). Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel.

Your Objection must include the case name and docket number, *Leo Woytach, et al v. Drug and Alcohol Treatment Services, Inc.*, Case No. 2025-CV-03681, and be submitted to the Settlement Administrator by First-Class mail, received no later than August 25, 2026, to:

DATS Settlement  
c/o RG/2 Claims Administration LLC  
P.O. Box 59479  
Philadelphia, PA 19102-9479

If you do not submit your objection with all requirements, or if your objection is not received by August 25, 2026, you will be considered to have waived all Objections and will not be entitled to speak at the Final Approval Hearing.

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

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the 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 Settlement no longer affects you.

**THE FINAL APPROVAL HEARING**

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

The Court will hold the Final Approval Hearing on November 24, 2026 at 10:30 a.m. in Courtroom #1, Lackawanna County Courthouse. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check [www.DATSDataSettlement.com](http://www.DATSDataSettlement.com) for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of Attorneys' Fees, Costs, and Expenses to Class Counsel and the request for a service award to the Class Representative.

### **18. Do I have to come to the hearing?**

No. You are not required to come to the Final Approval Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Approval Hearing, but that is not necessary.

### **19. May I speak at the hearing?**

Yes. You can speak at the Final Approval Hearing but you must ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required. You cannot speak at the hearing if you exclude yourself from the Settlement.

### **DO NOTHING**

### **20. What happens if I do nothing?**

If you do nothing, you will not get any money from the Settlement, you will not be able to sue for the claims in this case, and you release the claims against Defendant described in Question 8.

### **GET MORE INFORMATION**

### **21. How do I get more information about the Settlement?**

This is only a summary of the proposed Settlement. If you want additional information about this lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees and Expenses, and more, please visit [www.DATSDataSettlement.com](http://www.DATSDataSettlement.com) or call 1-866-742-4955. You may also contact the Settlement Administrator at DATS Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR DEFENDANT'S COUNSEL.**