

If your Private Information was implicated in the Data Incident involving Regional Obstetrical Consultants, P.C. on or about May 6, 2024, you may be entitled to Settlement Class Member Benefits from a Settlement.

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

- A Settlement has been reached in a class action lawsuit against Regional Obstetrical Consultants, P.C. (“Defendant”) involving a Data Incident that occurred on Defendant’s network on or about May 6, 2024. The Data Incident involved the unauthorized access to or acquisition of Private Information belonging to members of the Settlement Class. The Private Information includes, but is not limited to, names, dates of birth, addresses, phone numbers, medical record number, insurance ID number, diagnosis, medical history, and procedures, and any other type of personally identifiable information or protected health information.
- The Settlement Class includes: all living individuals in the United States whose Private Information was implicated in the Data Incident.
- If you are a member of the Settlement Class, you can submit a Claim Form for one of the following Settlement Class Member Benefits:

Cash Payment A – Extraordinary Documented Losses: You may submit a Claim Form with reasonable documentation for extraordinary documented losses related to the Data Incident for up to \$7,500 per Settlement Class Member;

OR

Cash Payment B – Ordinary Documented Losses: You may submit a Claim Form with reasonable documentation for ordinary documented losses related to the Data Incident for up to \$2,000 per Settlement Class Member;

OR

Cash Payment C – Alternate Cash Payment: Instead of Cash Payment A (Extraordinary Documented Losses) or Cash Payment B (Ordinary Documented Losses), without providing documentation, you may submit a Claim Form to receive an alternative cash payment in the amount of \$50.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights and Options		Deadline
Submit a Claim Form	The only way to get Settlement Class Member Benefits is to submit a timely and valid Claim Form.	Submitted or Postmarked by: February 15, 2026
Exclude Yourself	Get no Cash Payment. Keep your right to file your own lawsuit against the Released Parties about the Released Claims that are released by the Settlement in this lawsuit.	Postmarked by: January 31, 2026
Object to the Settlement	Stay in the Settlement but tell the Court why you do not agree with the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed by: January 31, 2026
Do Nothing	Get no Cash Payment. Give up your legal rights.	

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court must decide whether to approve the Settlement and Class Counsel’s Application for Attorneys’ Fees, Costs, and Service Awards. No Settlement Class Member Benefits will be provided unless the Court approves the Settlement.

Questions? Go to www.ROCDDataSettlement.com or call 1-877-450-8783

BASIC INFORMATION

1. Why is this Notice being provided?

A court authorized this Notice because you have the right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what Settlement Class Member Benefits are available, who is eligible for the Settlement Class Member Benefits, and how to get them.

The Honorable Pamela A. Fleenor of the Tenth Judicial District of the Chancery Court of Hamilton County, Tennessee is overseeing this class action. The lawsuit is known as *Heidi Davis v. Regional Obstetrical Consultants, P.C.*, Case No. 25-0083 (“lawsuit”). The individuals who filed this lawsuit are called the “Plaintiffs” and/or “Class Representatives” and the company sued, Regional Obstetrical Consultants, P.C., is called the “Defendant.”

2. What is this lawsuit about?

Plaintiffs filed this lawsuit against Defendant on behalf of themselves and all others allegedly similarly situated involving a Data Incident that occurred on Defendant’s network on or about May 6, 2024. The Data Incident involved the unauthorized access to or acquisition of Private Information belonging to members of the Settlement Class. The Private Information includes, but is not limited to, names, dates of birth, addresses, phone numbers, medical record number, insurance ID number, diagnosis, medical history, and procedures, and any other type of personally identifiable information or protected health information.

Defendant denies the legal claims and denies any wrongdoing or liability. The Court has not made any determination of any wrongdoing by Defendant, or that any law has been violated. Instead, Plaintiffs and Defendant have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

3. Why is the lawsuit a class action?

In a class action, one or more people (called class representatives) sue on behalf of all people who they allege have similar legal claims. Together, after a court grants certification, all these people are called a class or class members, and because this lawsuit is settled, they are called “Settlement Class Members.” One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt-out) from the class.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the legal claims made in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of Plaintiffs or Defendant. Instead, Plaintiffs and Defendant have agreed to settle the lawsuit. The Class Representatives, Defendant, and their lawyers believe the Settlement is best for the Settlement Class because of the Settlement Class Member Benefits available and the risks and uncertainty associated with continuing the lawsuit.

Questions? Go to www.ROCDataSettlement.com or call 1-877-450-8783

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are included in the Settlement Class if you are a living individual in the United States whose Private Information was implicated in the Data Incident.

6. Are there exceptions to being included in the Settlement?

Yes. 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 lawsuit, that Judge's immediate family, and Court staff; and (d) all individuals who timely and validly opt-out of the Settlement.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class member, you may go to www.ROCDDataSettlement.com or call toll-free 1-877-450-8783.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

If you are a Settlement Class Member, you can submit a Claim Form for one of the following Settlement Class Member Benefits:

Cash Payment A – Extraordinary Documented Losses

You may submit a Claim Form with reasonable documentation for extraordinary documented losses related to the Data Incident for up to \$7,500 per Settlement Class Member if:

- (1) the loss is an actual, documented and unreimbursed monetary loss arising out or relating to identity theft;
- (2) the loss is fairly traceable to the Data Incident;
- (3) the loss occurred between May 6, 2024, and the Claims Deadline;
- (4) the loss is not already covered by one or more of the reimbursement categories below; and
- (5) you made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring insurance and identity theft insurance.

Cash Payment B – Ordinary Documented Losses

You may submit a Claim Form with reasonable documentation for ordinary documented losses related to the Data Incident for up to \$2,000 per Settlement Class Member.

Examples of ordinary documented losses related to the Data Incident may include (without limitation):

- (1) unreimbursed losses or charges relating to identity theft or identity fraud, falsified tax returns or other possible misuse of your Private Information;
- (2) unreimbursed costs incurred on or after May 6, 2024, associated with accessing or freezing/unfreezing credit reports with any credit reporting agency;

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- (3) other unreimbursed miscellaneous expenses incurred related to any ordinary documented loss such as notary, fax, postage, copying, mileage, and long-distance telephone charges; and
- (4) other mitigative costs fairly traceable to the Data Incident that were incurred on or after May 6, 2024, through date of your Claim submission.

Examples of reasonable documentation include, but are not limited to, telephone records, correspondence including emails, or receipts. Documentation must be generated or prepared by a third party supporting expenses paid. Personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute reasonable documentation but may be included to provide clarification, context, or support for other submitted reasonable documentation.

You will not be reimbursed for expenses if you have been reimbursed for the same expenses by another source, including compensation provided in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by Defendant or otherwise.

If you do not submit reasonable documentation supporting a Cash Payment A (Extraordinary Documented Losses) or Cash Payment B (Ordinary Documented Losses), or if your Claim Form is invalid as determined by the Settlement Administrator, and you do not cure your Claim Form, your Claim Form will be treated as if you elected Cash Payment C (Alternate Cash Payment).

Cash Payment C – Alternate Cash Payment

Instead of Cash Payment A (Extraordinary Documented Losses) or Cash Payment B (Ordinary Documented Losses), without providing documentation, you may submit a Claim Form to receive an alternative cash payment in the amount of \$50.

9. What am I giving up to receive a Cash Payment or stay in the Settlement Class?

Unless you exclude yourself (opt-out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Released Parties about the Released Claims in this lawsuit. The specific rights you are giving up are called “Released Claims.”

10. What are the Released Claims?

Section XI of the Settlement Agreement describes the Release, Released Claims and Released Parties, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.ROCDDataSettlement.com. For questions regarding the Release, Released Claims, or Released Parties and what the language in the Settlement Agreement means, you can also contact Class Counsel listed below for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

11. How do I submit a Claim Form?

You must submit a timely and valid Claim Form to receive the Settlement Class Member Benefits as described above. Your Claim Form must be submitted online at www.ROCDDataSettlement.com by **February 15, 2026**, or mailed to the Settlement Administrator at the address on the Claim Form, **postmarked by February 15, 2026**. Claim Forms are also available at www.ROCDDataSettlement.com or by calling 1-877-450-8783 or by writing to:

Questions? Go to www.ROCDDataSettlement.com or call 1-877-450-8783

Regional Obstetrical Data Incident
Settlement Administrator
PO Box 4394
Portland, OR 97208-4394

12. What happens if my contact information changes after I submit a Claim Form?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by writing to:

Regional Obstetrical Data Incident
Settlement Administrator
PO Box 4394
Portland, OR 97208-4394

13. When will I receive my Settlement Class Member Benefits?

If you submit a timely and valid Claim Form, Settlement Class Member Benefits will be provided after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check www.ROCDDataSettlement.com for updates.

EXCLUDE YOURSELF OR OPT-OUT OF THE SETTLEMENT

If you are a member of the Settlement Class and want to keep any right you may have to sue or continue to sue the Released Parties on your own about the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting-out” of—the Settlement.

14. How do I opt-out of the Settlement?

To exclude yourself from the Settlement, you must mail a written request for exclusion, which includes the following:

- 1) Your name, address, telephone number and email address (if any);
- 2) Your personal physical signature; and
- 3) A statement that you want to be excluded from the Settlement Class, such as “I request to be excluded from the Settlement Class in *Heidi Davis v. Regional Obstetrical Consultants, P.C.*”

The exclusion request must be **mailed** to the Settlement Administrator at the following address, and be **postmarked** by **January 31, 2026**:

Regional Obstetrical Data Incident
Settlement Administrator
PO Box 4394
Portland, OR 97208-4394

You cannot opt-out (exclude yourself) by telephone or by email.

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of Settlement Class members or multiple Settlement Class members where the opt-out has not been signed by each and every individual Settlement Class member will not be allowed.

Questions? Go to www.ROCDDataSettlement.com or call 1-877-450-8783

15. If I opt-out can I still get anything from the Settlement?

No. If you timely opt-out, you will not be entitled to receive Settlement Class Member Benefits, and you will not be bound by the Settlement or any judgment in this lawsuit. You can only get Settlement Class Member Benefits if you stay in the Settlement and submit a timely and valid Claim Form.

16. If I do not opt-out, can I sue Defendant for the same thing later?

No. Unless you opt-out, you give up any right to sue any of the Released Parties for the legal claims this Settlement resolves and Releases, and you will be bound by all the terms of the Settlement, proceedings, orders, and judgments in the lawsuit. You must opt-out of this lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against the Released Parties about the Released Claims in this Settlement. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class member, you can tell the Court you do not agree with all or any part of the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards.

To object, you must file your objection with the Court by **January 31, 2026**, and send your objection by U.S. mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked by or shipped by private courier (such as Federal Express) by **January 31, 2026**, stating that you object to the Settlement in *Heidi Davis v. Regional Obstetrical Consultants, P.C.*, Case No. 25-0083.

To file an objection, you cannot exclude yourself from the Settlement Class. Your objection must include all of the following information:

1. Your 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 you or your lawyer;
3. The number of times you have objected to a class action settlement within the five years preceding the date that you filed this objection, the caption of each case in which you have made an objection, and a copy of any orders related to or ruling on your prior objections that were issued by the trial and appellate courts in each listed case;
4. The identity of all lawyers who represent you, including any former or current lawyers 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;
5. The number of times your lawyer and/or their 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 your lawyer or the law firm has made an objection and a copy of any orders related to or ruling of your lawyer's or their law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your lawyer and/or your lawyer's law firm have objected to a class action settlement within the preceding five years;
6. The identity of all lawyers (if any) representing you, and whether they will appear at the Final Approval Hearing;
7. A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);

Questions? Go to www.ROCDataSettlement.com or call 1-877-450-8783

8. A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
9. Your signature as the objector (a lawyer's signature is not sufficient).

Class Counsel and/or Defendant's counsel may conduct limited discovery on any objector or objector's lawyer.

To object, you must file your timely written objection with the Court by **January 31, 2026**, and send it by U.S. mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked by or shipped by private courier (such as Federal Express) by **January 31, 2026**, at the following addresses:

Court	Class Counsel	Defendant's Counsel	Settlement Administrator
10 th Judicial District Hamilton County Courthouse 625 Georgia Ave. Unit 311 Chattanooga, TN 37402	J. Gerard Stranch, IV Grayson Wells Stranch, Jennings & Garvey, PLLC 223 Rosa L. Parks Ave. Suite 200 Nashville, Tennessee 37203 Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd. Suite 500 Fort Lauderdale, FL 33301 Gary Klinger Milberg Coleman Bryson Phillips Grossman PLLC 227 W. Monroe St. Suite 2100 Chicago, IL 60606	David Ross Wilson, Elser, Moskowitz, Edleman & Dicker LLP 1500 K St. NW Suite 330 Washington, D.C. 20005	<i>Regional Obstetrical Data Incident</i> Settlement Administrator PO Box 4394 Portland, OR 97208-4394

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

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Opting-out is telling the Court that you do not want to be part of the Settlement Class. If you opt-out, you cannot object because you are no longer part of the Settlement.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this lawsuit?

Yes. The Court has appointed J. Gerard Stranch, IV of Stranch, Jennings & Garvey, PLLC, Jeff Ostrow of Kopelowitz Ostrow P.A., and Gary Klinger of Milberg Coleman Bryson Phillips Grossman PLLC as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost if you want someone other than Class Counsel to represent you in this lawsuit.

Questions? Go to www.ROCDataSettlement.com or call 1-877-450-8783

20. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees and costs up to \$275,000. Class Counsel will also ask the Court to approve Service Awards for the Class Representatives of up to \$2,000 each for their efforts. If awarded by the Court, the attorneys' fees and costs, and the Service Awards will be paid directly by Defendant separate from Defendant's obligation to pay Settlement Class Member Benefits. The Court may award less than these amounts.

THE FINAL APPROVAL HEARING

The Court will hold a "Final Approval Hearing" to decide whether to approve the Settlement and Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards. You may attend and you may ask to speak if you submit an objection by the deadline, but you do not have to.

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

The Court will hold a Final Approval Hearing on **March 2, 2026, at 1:30 p.m.** before the Honorable Pamela A. Fleenor at the Hamilton County Courthouse, 625 Georgia Avenue, Unit 311, Chattanooga, TN 37402. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement and Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards.

If there are objections that were filed by the deadline, the Court will consider them. If you file a timely objection, and you would like to speak at the hearing, the Court, at its discretion, may listen to you or your lawyer speak at the hearing, if you so request.

Note: The date and time of the Final Approval Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website www.ROCDDataSettlement.com to confirm the date and time of the Final Approval Hearing have not changed.

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

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to attend the Final Approval Hearing to speak about it. As long as you file a written objection by the deadline, the Court will consider it.

23. May I speak at the Final Approval Hearing?

If there are objections that were filed by the deadline, the Court will consider them. If you file a timely objection, and you (or your lawyer) ask to speak at the hearing, the Court, at its discretion, may hear objections at the hearing.

IF YOU DO NOTHING

24. What happens if I do nothing at all?

If you are a Settlement Class member and you do nothing, you will not receive Settlement Class Member Benefits, and you will give up your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against any of the Released Parties this Settlement resolves and Releases,

Questions? Go to www.ROCDDataSettlement.com or call 1-877-450-8783

and you will be bound by all the terms of the Settlement, proceedings, orders, and judgments in the lawsuit.

GETTING MORE INFORMATION

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

This Notice summarizes the Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.ROCDDataSettlement.com. You may get additional information at www.ROCDDataSettlement.com, by calling toll-free 1-877-450-8783, or by writing to:

Regional Obstetrical Data Incident
Settlement Administrator
PO Box 4394
Portland, OR 97208-4394

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S
CLERK OFFICE REGARDING THIS NOTICE.**

Questions? Go to www.ROCDDataSettlement.com or call 1-877-450-8783