

Educational Computer Systems, Inc.
Security Incident Class Action Settlement

Hood, et al. v. Educational Computer Systems, Inc., No. 2:24-cv-00666-CCW (W.D. Pa.)

If your personal information was potentially accessed in a cybercriminal attack perpetrated on Educational Computer Systems, Inc. (“ECSI”) between October 2023 and February 2024, you could receive a benefit from a class action settlement.

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

Please read this notice carefully and completely; your legal rights are affected whether you act or don’t act.

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

- A settlement has been proposed in a class action lawsuit against Educational Computer Systems, Inc. (“Defendant” or “ECSI”). The settlement resolves claims brought by individuals potentially impacted by a criminal cyberattack perpetrated on ECSI’s website between October 29, 2023 and February 12, 2024 (the “Security Incident”) and may have involved certain of your personal identifying information (“Personal Information”).
- You may be eligible to receive from the Settlement either reimbursement for documented unreimbursed losses more likely than not caused by the Security Incident up to \$5,000.00 (“Out-Of-Pocket Losses”), or in the alternative to reimbursement of Out-Of-Pocket Losses, you may request a cash payment (“Alternative Cash Payment”) estimated to be approximately \$100.00. The amount of the Alternative Cash Payment is subject to a *pro rata* reduction or increase depending on the total number of approved claims submitted. To receive a payment, you must complete and submit a “Claim Form.”
- Please read this notice carefully. Your legal rights will be affected, and you have a choice to make now.

Summary of Your Legal Rights and Options		Deadline
SUBMIT A CLAIM FORM	You must submit a valid Claim Form to get monetary relief from this Settlement.	Online at www.DataSettlementECSI.com or postmarked by December 21, 2026 .
EXCLUDE YOURSELF FROM THE SETTLEMENT	Avoid being bound by the settlement. Get no money. Keep your rights to sue. This is the only option that allows you to keep your right to sue individually	Postmarked by November 20, 2026 .

	about the Security Incident or the claims in this lawsuit. You will not get any money from the settlement.	
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	Tell the Court the reasons why you do not believe the settlement should be approved. You can also ask to speak to the Court at the hearing on January 11, 2027 , about the fairness of the settlement, with or without your own attorney.	File with the Court or mail to the Court and attorneys for the class representatives and ECSI by November 20, 2026 .
DO NOTHING	Receive no payment and be bound by the terms of the settlement.	None.

- 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 approve the settlement. Payments will be made if the Court approves the settlement, after any appeals are resolved.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION.....	5
1. Why did I get this notice?	
2. What is this lawsuit about?	
3. What is a class action?	
4. Why is there a Settlement?	
WHO IS INCLUDED IN THE SETTLEMENT	6
5. Who is included in the Settlement?	
6. Are there exceptions to being included?	
7. What should I do if I am not sure whether I am included?	
THE SETTLEMENT BENEFITS	6
8. What does the Settlement provide?	
9. What can I get from the Settlement?	
10. What am I giving up if I stay in the Settlement Class?	
HOW TO GET A PAYMENT – MAKING A CLAIM.....	7
11. How can I receive a payment?	
12. How much will my payment be?	
13. When will I receive my payment?	
THE LAWYERS REPRESENTING YOU	8
14. Do I have a lawyer in this case?	
15. Should I get my own lawyer?	
16. How will the lawyers be paid?	
EXCLUDING YOURSELF FROM THE SETTLEMENT	8
17. How do I get out of the Settlement?	
18. If I am a Settlement Class Member and don't opt out, can I sue ECSI for the same thing later?	
19. What happens if I opt out?	
COMMENTING ON OR OBJECTING TO THE SETTLEMENT	9
20. How do I tell the Court if I don't like the Settlement?	
21. What's the difference between objecting and opting out?	

THE COURT’S FINAL APPROVAL HEARING..... 11

- 22. When and where will the Court decide whether to approve the Settlement?**
- 23. Do I have to attend the final approval hearing?**
- 24. May I speak at the hearing?**

IF I DO NOTHING..... 11

- 25. What happens if I do nothing at all?**

GETTING MORE INFORMATION..... 12

- 26. Are more details about the Settlement available?**
- 27. How do I get more information?**

BASIC INFORMATION

1. Why did I get this notice?

You are receiving this notice because your Personal Information was potentially accessed in the Security Incident. A group of similarly situated individuals brought a proposed class action lawsuit against ECSI arising out of the Security Incident. ECSI denies the allegations made against it and denies that it is liable. The Court has not decided in favor of either side. The parties have now reached a proposed settlement of the lawsuit (the “Settlement”).

A court authorized this notice because you are entitled to know about your rights under the proposed class action Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after objections and appeals are resolved, a settlement administrator appointed by the Court will make the payments that the Settlement allows and the pending legal claims against ECSI will be released and dismissed.

This notice explains the lawsuit, the Settlement, your rights, what benefits are available, who is eligible for them, and how to get them. The Settlement has been reached in a case pending before the United States District Court for the Western District of Pennsylvania titled *Hood, et al. v. Educational Computer Systems, Inc.*, No. 2:24-cv-00666-CCW.

2. What is this lawsuit about?

This matter is a putative class action arising from a criminal cyberattack that was perpetrated against ECSI between October 29, 2023 and February 12, 2024, resulting in the potential unauthorized access of certain Personal Information (the “Litigation”). The Litigation asserts claims against ECSI for allegedly inadequate data security practices.

ECSI denies any and all allegations of wrongdoing, and the Court has not found in favor of either side.

3. What is a class action?

In a class action, one or more individuals called “Class Representatives” sue on behalf of themselves and others who have similar claims. The latter group of individuals is called the “class,” and the individuals in the class entitled to benefit from the Settlement are called “Settlement Class Members” or the “Settlement Class.” One court resolves the issues for all Settlement Class Members, except for those individuals who exclude themselves from the Settlement Class. The individuals who sued are called the Plaintiffs. The entity they sued—ECSI—is called the Defendant.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendant. Instead, both sides agreed to the Settlement. That way, they avoid the costs and risks of a trial, and Settlement Class Members can receive benefits or compensation. The Class Representatives and their attorneys (“Class Counsel”) believe the Settlement is in the best interest of the Settlement Class given the uncertainty and risk of future litigation.

WHO IS INCLUDED IN THE SETTLEMENT

5. Who is included in the Settlement?

The Settlement Class is defined as “all Persons residing within the United States whose Personal Information was potentially accessed in the Security Incident.”

6. Are there exceptions to being included?

Yes, the following are not included in the Settlement Class: (1) the judge to whom the Litigation is assigned and any member of the judge’s staff or immediate family; (2) any 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 Security Incident or who pleads *nolo contendere* to any such charge; and (3) any individual who timely and validly requests exclusion from the Settlement.

7. What should I do if I am not sure whether I am included?

If you are not sure whether you are included in the Settlement Class, you can call the settlement administrator at 1-877-726-4268 or you can visit **www.DataSettlementECI.com** for more information.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

Under the Settlement, ECSI will establish a settlement fund of \$6,500,000.00, which will be used, in part, to compensate Settlement Class Members who submit valid and approved claims as explained in Section 9.

9. What can I get from the Settlement?

Settlement Class Members may file a claim for one or more of the following settlement benefits:

Reimbursement of Out-Of-Pocket Losses: Settlement Class Members who suffered proven, unreimbursed losses that were more likely than not caused by the Security Incident and who timely submit a valid claim supported by sufficient documentation, will be eligible for a payment of up to five thousand dollars (\$5,000.00), but not more than the documented loss proven. These losses include (i) proven monetary losses that were more likely than not caused by the Security Incident and which occurred between October 29, 2023, and December 21, 2026; (ii) out-of-pocket expenses incurred as a result of the Security Incident (to be determined by the settlement administrator with no right of appeal), including bank fees, long distance phone calls, cell phone charges (only if charged by the minute), data charges (only if based on the amount of data used), postage, or gasoline for local travel; (iii) fees for credit reports, credit monitoring, or other identity theft services or insurance purchased between October 29, 2023 and December 21, 2026; or (iv) any other loss that is: (a) is an actual, documented, and unreimbursed monetary loss; (b) more likely than not caused by the Security Incident; and (c) occurred between October 29, 2023 and December 21, 2026.

To receive reimbursement of Out-Of-Pocket Losses, your claim must be supported by reasonable documentation. You must enclose or upload documentation sufficient to show (a) the amount of unreimbursed loss that you suffered and (b) why you believe that the loss was more likely than not caused by the Security Incident. Documents for financial expenses may include credit card or bank statements, emails, invoices, receipts, or telephone records, including photographs of the same. “Self-prepared documents” such as handwritten receipts are, by themselves, insufficient to receive reimbursement, and claims based on such documents will be rejected by the settlement administrator.

Alternative Cash Payment: In the alternative to the reimbursement of Out-Of-Pocket Losses, Settlement Class Members may submit a claim to receive a *pro rata* Alternative Cash Payment. The amount of the Alternative Cash Payment is estimated to be approximately \$100.00, but is subject to a *pro rata* increase or decrease based on the number of total approved claims, and will be calculated at the end of the settlement process.

A Settlement Class Member may receive only one of (i) reimbursement of Out-Of-Pocket Losses and (ii) an Alternative Cash Payment. A Settlement Class Member may **not** receive both of these benefits.

10. What am I giving up if I stay in the Settlement Class?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against ECSI or other released parties concerning the claims released by the Settlement. The “Releases” section in the settlement agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be viewed at **www.DataSettlementECSI.com**.

HOW TO GET A PAYMENT – MAKING A CLAIM

11. How can I receive a payment?

You must complete and submit a Claim Form by December 21, 2026. Claim Forms may be submitted to the settlement administrator online at **www.DataSettlementECSI.com** by December 21, 2026, or printed from the website and mailed to the settlement administrator at the address on the form, postmarked by December 21, 2026.

Be sure to read the Claim Form instructions carefully, include all required information, and add your signature.

The settlement administrator will review your claim to determine the validity and amount of your payment.

12. How much will my payment be?

The amount of your payment will depend on the approved amount of your claim and the total value of all approved claims. The Alternative Cash Payments will be distributed on a *pro rata* basis, which will be determined by the number of valid and timely claims.

13. When will I receive my payment?

The Court will hold a telephonic hearing on **January 11, 2027, at 9:30am EST** to decide whether to approve the Settlement. Payments will be made after the Settlement is approved and becomes final (which will be after any appeal from the order approving the Settlement is resolved). Updates regarding the Settlement will be posted on the settlement website at **www.DataSettlementECI.com**.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The Court appointed Nicholas A. Colella of Lynch Carpenter LLP and Nickolas J. Hagman of Cafferty Clobes Meriwether & Sprengel LLP as attorneys to represent the Settlement Class. These lawyers are called “Class Counsel.”

15. Should I get my own lawyer?

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 can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

16. How will the lawyers be paid?

The attorneys representing the Settlement Class have not yet received any payment for their legal services or any reimbursement of the costs or out-of-pocket expenses they have incurred in prosecuting the Litigation. Class Counsel plans to ask the Court to award attorneys’ fees, costs, and expenses from the settlement fund, as defined by the settlement agreement, not to exceed one-third of the Settlement Fund, or up to \$2,166,666.66.

The Settlement Class is represented by the Class Representatives. In addition to the benefits that the Class Representatives will receive as members of the Settlement Class—and subject to the approval of the Court—the Class Representatives will be paid service awards of \$2,500.00 each from the settlement fund for the efforts they have expended on behalf of the Settlement Class.

The Court will determine whether to approve the amount of fees, costs, and expenses requested by Class Counsel and the proposed service awards to the Class Representatives. Class Counsel will file an application for fees, expenses, and service awards no later than **November 5, 2026**. The application will be available on the Settlement Website **www.DataSettlementECI.com** or you can request a copy by contacting the Settlement Administrator.

EXCLUDING YOURSELF FROM THE SETTLEMENT

17. How do I get out of the Settlement?

If you are a Settlement Class Member and you do not want the benefits from the Settlement or you want to keep your right, if any, to sue ECSI on your own about the legal issues in this Litigation or related to the Security Incident, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement Class.

If you want to opt out of the Settlement, you must do so by **November 20, 2026**. To opt out, you must send a letter or postcard via U.S. mail to the address below. You must include the following in your letter or postcard:

- The name and case number of this Litigation: *Hood v. Educational Computer Systems, Inc.*, Case No. 2:24-cv-00666-CCW (W.D. Pa.);
- Your full name, postal address, email address;
- Your personal, physical signature; and
- A statement that clearly manifests your intent to be excluded from the Settlement Class for purposes of this Settlement.

You must mail your opt-out request via first-class U.S. Mail, postmarked no later than **November 20, 2026** to:

ECSI Security Incident Settlement Administrator
ATTN: Exclusion Requests
P.O. Box 58220
Philadelphia, PA 19102

If you fail to include the required information, your request will be deemed invalid and you will remain a Settlement Class Member and be bound by the Settlement, including all releases.

18. If I am a Settlement Class Member and don't opt out, can I sue ECSI for the same thing later?

No. You must opt out of the Settlement to keep your right to sue ECSI or other released parties for any of the claims released by the Settlement. The claims released by the Settlement are set out in full in the settlement agreement. Please read the Settlement Agreement for more information about the claims being released.

19. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class. You will not receive a payment as part of the Settlement. You will not be bound by the Settlement, the releases in the settlement agreement, or by any further orders or judgments in the Litigation. You will keep the right, if you have any, to sue for the claims alleged in the Litigation or related to the Security Incident at your own expense.

In addition, if you opt out of the Settlement, you cannot object to the Settlement because the Settlement no longer affects you. If you object to the Settlement and request to exclude yourself, your objection will be voided and you will be deemed to have excluded yourself.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

20. How do I tell the Court if I don't like the Settlement?

If you are a Settlement Class Member and you do not opt out of the Settlement, you can object to the Settlement if you do not think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. You can't ask the Court to change the Settlement or order a different Settlement; the Court can only approve or deny this Settlement. If the Court denies approval, no Settlement payments will be sent out and the Litigation will continue. If that is what you want to happen, you must object.

You may object to any part of the proposed Settlement in writing. You may also appear at the final approval hearing the Court will hold, either yourself or through your own attorney, but you do not have to. If you appear through your own attorney, you are responsible for paying that attorney.

If you object, you must include:

- (i) your full name, postal address, and email address;
- (ii) the case name and number of this Litigation, *Hood v. Educational Computer Systems, Inc.*, Case No. 2:24-cv-00666-CCW;
- (iii) information identifying yourself as a Settlement Class Member, including proof that you are a member of the Settlement Class (e.g., a copy of your settlement notice, a copy of an original notice of the Security Incident, or a statement explaining why you believe you are a Settlement Class Member);
- (iv) a statement of whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- (v) a written statement of all grounds for the objection, accompanied by any legal or factual support for the objection you believe is applicable;
- (vi) the identity and contact information (including name, phone number, and email address) of any and all attorneys representing you in connection with your objection;
- (vii) a statement whether you will appear at the final approval hearing the Court will hold (and if so, whether you will appear personally or through an attorney); and
- (viii) your signature or the signature of your duly authorized attorney.

Any objection you make must be (1) mailed to each of the following: (a) Clerk's Office of the United States District Court for the Western District of Pennsylvania, Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Pittsburgh, PA 15219; (b) Class Counsel (as set forth below); and (c) ECSI's attorneys at King & Spalding, LLP, c/o Robert Griest, 1180 Peachtree Street, N.E., Ste. 1600, Atlanta, GA 30309; **or** (2) filed with the Court in person or electronically.

The objection must be postmarked or filed no later than **November 20, 2026**.

21. What's the difference between objecting and opting out?

Objecting is telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you are a Settlement Class Member and do not opt out of the Settlement.

Opting out of the Settlement is telling the Court that you don't want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it does not affect you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a final approval hearing at **9:30am EST on January 11, 2027**, by telephone. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate; whether to approve Class Counsel's application for attorneys' fees, costs, and expenses; and whether to approve service awards to the Class Representatives. If there are objections, the Court will consider them. The Court may choose to hear from individuals who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

The Court may reschedule the final approval hearing or change any of the deadlines described in this notice. The date of the final approval hearing may change without further notice to the Settlement Class. Be sure to check the website **www.DataSettlementECSI.com** for updates. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.pawd.uscourts.gov>.

Class Counsel will file a motion for final approval of the Settlement by **December 21, 2026**.

23. Do I have to attend the final approval hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to attend the hearing to talk about it. As long as you mailed or filed your written objection on time and complied with other requirements for objections listed above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

24. 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 include in your written objection (see Question 20) (i) a statement that you intend to appear at the hearing, (ii) an indication of whether you intend to appear at the hearing yourself or through your attorney, (iii) a detailed description of any evidence you might offer at the hearing, and (iv) copies of any exhibits you may introduce at the hearing. Be sure to include your name, address, and signature as well. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

IF I DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing, you will not receive any money from the Settlement and you will not be able to sue ECSI or other released parties for the claims released by the settlement agreement, including those brought in the Litigation or related to the Security Incident.

GETTING MORE INFORMATION

26. Are more details about the Settlement available?

This notice only summarizes the proposed Settlement. You can access more details regarding the Settlement by reviewing the Settlement Agreement and other case documents available at **www.DataSettlementECI.com**, by accessing the case file in the Litigation through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.pawd.uscourts.gov>, or by visiting the office of the Clerk's Office for the United States District Court for the Western District of Pennsylvania, 700 Grant Street, Pittsburgh, PA 15219 between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

27. How do I get more information?

Visit the website, **www.DataSettlementECI.com** where you will find more information, including the Claim Form, a copy of the settlement agreement, and answers to questions about the Settlement and other information to help you determine whether you are eligible for a payment.

Contact the Settlement Administrator at 1-877-726-4268 or by writing to the settlement administrator at:

ECI Security Incident Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Contact Class Counsel at the following:

Nicholas Colella
LYNCH CARPENTER LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
nickc@lcllp.com

Nickolas J. Hagman
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
135 S. LaSalle Street, Ste. 3210
Chicago, IL 60603
nhagman@caffertyclobes.com

PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE, ECI, OR ECI'S COUNSEL TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.