

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Fetes, et al. v. Lee Enterprises, Inc.

Case No. 3:25-cv-00067-SMR-SBJ

United States District Court for the Southern District of Iowa

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE
FEBRUARY 2025 LEE ENTERPRISES, INCORPORATED, DATA SECURITY
INCIDENT,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

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

You are not being sued.

Please read this Notice carefully and completely.

- A Settlement has been reached with Lee Enterprises, Incorporated (“Lee Enterprises” or “Defendant”) in a class action lawsuit. This case is about the cybersecurity incident that Lee Enterprises experienced in February 2025 (the “Data Security Incident”). Certain files that contained Private Information may have been accessed. These files may have contained personal information such as names, Social Security numbers and medical information.
- The lawsuit is called *Fetes, et al. v. Lee Enterprises, Inc.*, Case No. 3:25-cv-00067-SMR-SBJ. It is pending in the United States District Court for the Southern District of Iowa (the “Litigation”).
- Lee Enterprises denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- Lee Enterprises' records indicate that you are a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Lee Enterprises.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	<p>The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at www.LeeEnterprisesSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.</p>	May 26, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment or Credit Monitoring. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	April 24, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt-out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement Class Member benefits.	<p>April 24, 2026- written objection deadline</p> <p>June 30, 2026 at 10:00 a.m.- Final Approval Hearing</p>
DO NOTHING	Unless you opt-out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement. You will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved and released by this Settlement.	No Deadline

- 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.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
WHO IS IN THE SETTLEMENT	4
THE SETTLEMENT BENEFITS.....	4
SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS	6
THE LAWYERS REPRESENTING YOU	7
OPTING OUT FROM THE SETTLEMENT	7
COMMENTING ON OR OBJECTING TO THE SETTLEMENT.....	8
THE COURT’S FINAL APPROVAL HEARING	9
IF I DO NOTHING	9
GETTING MORE INFORMATION	10

Basic Information

1. Why was this Notice issued?

The United States District Court for the Southern District of Iowa, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Fetes, et al. v. Lee Enterprises, Inc.*, Case No. 3:25-cv-00067-SMR-SBJ. It is pending in the United States District Court for the Southern District of Iowa. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Lee Enterprises, Incorporated, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during a cybersecurity incident that Lee Enterprises experienced in February 2025 , certain files that contained Private Information may have been accessed. These files may have contained personal information such as names, Social Security numbers and medical information.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this proposed Settlement, the Class Representatives are Sarah Fetes; Anthony Bangert; Declan Lawson; Nicole Church; Douglas Arp; and Briar Napier. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Settlement Class this way: “All persons identified as being among those individuals impacted by the Data Security Incident, including all who were sent a notice of the Data Security Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge(s) presiding over the Action and members of their immediate families and their staff; (2) Lee Enterprises and its subsidiaries, parent companies, successors, predecessors, and any entity in which Lee Enterprises, has a controlling interest; (3) natural persons who properly execute and submit a request to opt out prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

If you are not sure whether you are a Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@LeeEnterprisesSettlement.com
- Call toll free, 24/7: (833) 647-9093
- By mail: Lee Enterprises Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799
- You may also view the Settlement Agreement at www.LeeEnterprisesSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

All Settlement Class Members may claim **Credit Monitoring**, and either an **Alternative Cash Payment** OR **one** of the following two **Compensation Cash Payment** options:

OPTION A:

- Compensation for Ordinary Losses
- Compensation for Lost Time

OR

OPTION B:

- Compensation for Extraordinary Losses

CREDIT MONITORING SERVICES. All Settlement Class Members are eligible to enroll in one year of CyEx Financial Shield Total with three bureaus. This comprehensive service comes with \$1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH PAYMENTS. Settlement Class Members may claim payments from *either* Option A or Option B.

OPTION A

Compensation for Ordinary Losses (out-of-pocket expenses). If you incurred actual, documented out-of-pocket expenses due to the Data Security Incident, you can get back up to **\$1,000.00**. The losses must have occurred between June 1, 2025, and May 26, 2026.

This benefit covers out-of-pocket expenses like:

- fees for credit reports or credit monitoring
- bank fees, long distance phone charges, cell phone charges (only if charged based on the amount of the data used) postage to contact banks by mail
- gasoline for local travel
- up to 4 hours of lost time, at \$20/hour for time spent dealing with the Data Security Incident.

You need to send proof, like receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Security Incident.

You may submit claims for up to 4 hours of lost time with a signed attestation that You spent the claimed time responding to issues raised by the Data Security Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

Compensation for Lost Time. Class Members who spent time responding to the Data Security Incident may claim up to four hours, at \$20.00 per hour, for a maximum of **\$80.00**.

You must have spent the time on tasks related to the Data Security Incident. Some examples include things like:

- changing your passwords
- investigating suspicious activity in your accounts
- researching the Data Security Incident

You do not need to describe how you spent this time.

OPTION B

Compensation for Extraordinary Losses (losses from identity theft or fraud). If you lost money because of identity theft or fraud, you can get back up to **\$3,000.00**.

You will need to show that:

- the theft or fraud was probably caused by the Data Security Incident
- the losses are not already covered by **Ordinary Losses**
- you tried to prevent the loss or get your money back, such as by using insurance you already have

The losses must have occurred between June 1, 2025, and May 26, 2026.

You need to send proof, like receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are

not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Security Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

Alternative Cash Payment. In lieu of the benefits in Option A or Option B, you may claim a one-time *pro rata* cash payment. This payment is expected to be **\$35.00**. You cannot claim the **Alternative Cash Payment** if you have elected to claim **Compensation for Ordinary Losses** or **Compensation for Extraordinary Losses**.

You do not have to provide any proof or explanation to claim this payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@LeeEnterprisesSettlement.com
- Call toll free, 24/7: (833) 647-9093
- By mail: Lee Enterprises Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

8. What claims am I releasing if I stay in the Settlement Class?

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against Lee Enterprises about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section 4) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.LeeEnterprisesSettlement.com.

Submitting a Claim Form for a Settlement Payment

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.LeeEnterprisesSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Lee Enterprises Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (833) 647-9093, by email info@LeeEnterprisesSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by May 26, 2026. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than May 26, 2026.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on **June 30, 2026 at 10:00 a.m. (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

Please be patient.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC; Jeff Ostrow of Kopelowitz Ostrow; and Leanna A. Loginov of Shamis & Gentile, P.A., to represent you and other Settlement Class Members (“Class Counsel”).

13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the court to approve up to \$200,000.00 as reasonable attorneys’ fees and costs of litigation. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award payments of \$1,000.00 for each of the Class Representatives. Service Award payments will also be paid from the Settlement Fund.

Opting-Out from the Settlement

15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called an Opt-Out Request.

If you opt-out, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you opt-out. However, you will keep any rights you may have to sue Lee Enterprises on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is April 24, 2026.

To be valid, your Opt-Out Request must have the following information:

- (1) the name of the Litigation: *Fetes, et al. v. Lee Enterprises, Inc.*, Case No. 3:25-cv-00067-SMR-SBJ, pending in the United States District Court for the Southern District of Iowa;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Opt-Out Request” or a clear and similar statement that you do not want to participate in

the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Lee Enterprises Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Your Opt-Out Request must be submitted and postmarked by April 24, 2026.

Commenting on or Objecting to the Settlement

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

If you are a Settlement Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have opted-out from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Litigation: *Fetes, et al. v. Lee Enterprises, Inc.*, Case No. 3:25-cv-00067-SMR-SBJ, pending in the United States District Court for the Southern District of Iowa;
- (2) your full name, mailing address, unique identifier of the Settlement Class Member; telephone number, and email address (if any);
- (3) include proof that the Settlement Class Member is a member of the Settlement Class (e.g., copy of the Settlement Notice, copy of the original notice of the Data Security Incident);
- (4) identify the specific factual and legal grounds for the objection;
- (5) identify all counsel representing the Settlement Class Member, if any;
- (6) include a list, including case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement in the past five (5) years;
- (7) contain a statement regarding whether the Settlement Class Member (or counsel of his or her choosing) intends to appear at the Final Approval Hearing; and
- (8) your signature (if you have hired your own lawyer, their signature is not sufficient).

For your objection to be considered, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by April 24, 2026. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 111 Locust Street Des Moines, IA 50309	Lee Enterprises Data Security Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not opt-out from the Settlement. Opting out from the Settlement is stating to the Court that you do not want to be part of the Settlement. If you opt-out of the Settlement, you cannot object to it because the Settlement no longer affects you.

The Court’s Final Approval Hearing

18. When is the Court’s Final Approval Hearing?

The Court will hold a final approval on **June 30, 2026 at 10:00 a.m.** in Des Moines - Room 510 - 5th Floor Southeast.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide Class Counsel’s request for an attorneys’ fees and costs award and the request for a Service Award to the Class Representatives. The Court will also consider any timely objections to the Settlement.

If you are a Settlement Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check www.LeeEnterprisesSettlement.com for updates.

19. Do I have to come to 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, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

Getting More Information

21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.LeeEnterprisesSettlement.com.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@LeeEnterprisesSettlement.com
- Call toll free, 24/7: (833) 647-9093
- By mail: Lee Enterprises Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 111 Locust Street Des Moines, IA 50309.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT