

If your Private Information was potentially implicated in the Data Incident that First Choice Dental discovered in October 2023, you may be entitled to benefits from a Settlement.

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

- A settlement has been reached in a class action lawsuit against FCDG Management, LLC d/b/a First Choice Dental (“Defendant”) involving a Data Incident where cybercriminals potentially accessed Defendant’s system containing individuals’ Private Information on or about October 22, 2023. The Private Information involves sensitive information including, but not limited to, names, dates of birth, Social Security numbers, passport numbers, driver’s license numbers, government identification numbers, credit and debit card numbers, financial account numbers, and health information.
- The Settlement Class includes all individuals in the United States whose Private Information was implicated in the Data Incident discovered by Defendant in October 2023.
- If you are a Settlement Class Member, you can submit a Claim Form for one of the following Monetary Compensation options and Credit Monitoring:

Monetary Compensation:

Documented Economic Losses: Unreimbursed losses related to the Data Incident for up to \$6,000 per Settlement Class Member. Supporting documentation is required;

OR

Alternative Cash Payment: Instead of Documented Economic Losses, you may submit a Claim Form to receive an Alternative Cash payment for up to \$50. No documentation is required;

AND

Credit Monitoring: In addition to the Monetary Compensation, you may claim three years of CyEx Medical Shield monitoring, which includes \$1,000,000 in identity theft protection insurance.

The actual amount of Monetary Compensation may be prorated if the settlement administration costs, attorneys’ fees and expenses, service awards, and Monetary Compensation exceed the aggregate cap of \$1,225,000, so that the total amount to be paid will not exceed \$1,225,000.

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

Your Legal Rights & Options		Deadline
Submit a Claim Form	The only way to get Settlement benefits is to submit a timely and valid Claim Form.	Submitted or Postmarked by: JANUARY 28, 2026
Exclude Yourself	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against Defendant related to the legal claims resolved and released by this Settlement. You can hire your own legal counsel at your own expense.	Postmarked by: DECEMBER 29, 2025
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: DECEMBER 29, 2025
Do Nothing	Get no Settlement benefits. 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, attorneys’ fees, costs, and expenses, and

Questions? Go to www.FCDGDataSettlement.com.com or call 1- 888-344-7952

service awards. No Settlement benefits will be provided unless the Court approves the Settlement.

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 benefits are available, who is eligible for the Settlement benefits, and how to get them.

The Honorable Benjamin Jones of the Circuit Court of Dane County, Wisconsin is overseeing this class action. The lawsuit is known as *Kelly Gorder, et al., v. FCDG Management, LLC d/b/a First Choice Dental*, Case No. 2024CV002164 (“lawsuit”). The individuals who filed this lawsuit are called the “Plaintiffs” and/or “Class Representatives” and the company sued, FCDG Management, LLC d/b/a First Choice Dental, is called the “Defendant.”

2. What is this lawsuit about?

Plaintiffs filed this lawsuit against Defendant on behalf of themselves and all others similarly situated involving a Data Incident suffered by Defendant where cybercriminals potentially accessed Defendant’s computer systems containing your Private Information, which Defendant discovered in October 2023. The Private Information involves sensitive information including, but not limited to, names, dates of birth, Social Security numbers, passport numbers, driver’s license numbers, government identification numbers, credit and debit card numbers, financial account numbers, and health information.

Plaintiffs allege claims for negligence, negligence *per se*, breach of implied contract, invasion of privacy, unjust enrichment, breach of fiduciary duty, and for violations of Wisconsin Statute § 146.82. 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 this 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 class certification, all these people are called a class or 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.

The Class Representatives in this lawsuit are Plaintiffs Kelly Gorder, Emily Deann Harbison, Michael Webster, Christanthi Opitz, on behalf of D.T., a minor, Taylor Nicole Zurfluh-Taylor, Jillian Zachar, Bonnie Held, Caressa Bradenburg, Marianne From, Angelique Skipper, and Russell From, on behalf of himself and minors M.F. and O.F.

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

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

believe the Settlement is best for the Settlement Class because of the Settlement benefits available and the risks and uncertainty associated with continuing the lawsuit.

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are a Settlement Class Member if you are an individual in the United States whose Private Information was implicated in the Data Incident discovered by Defendant in October 2023.

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

Yes. Excluded from the Settlement Class are: (i) Defendant; (ii) the Related Entities; (iii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iv) any judges assigned to this case and their staff and family; and (v) 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 Incident or who pleads nolo contendere to any such charge.

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.FCDGDataSettlement.com, call toll-free **1-888-344-7952** or email FCDGDataSettlement@rg2claims.com.

THE SETTLEMENT BENEFITS

8. What does this Settlement provide?

If you are a Settlement Class Member, you can submit a timely and valid Claim Form for the following Settlement benefits:

Documented Economic Losses

You may submit a timely and valid Claim Form with documentation for out-of-pocket expenses incurred as a result of the Data Incident, up to a maximum of \$6,000.00 per person.

Documented Economic Losses include, without limitation and by way of example monetary loss from fraud or identity theft; professional fees including attorneys' fees, accountants' fees, and fees for credit repair services; costs associated with freezing or unfreezing credit with any credit reporting agency; credit monitoring costs that were incurred on or after mailing of the Notice of Data Incident, through the date of claim submission; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

You will not be reimbursed for expenses if you have been reimbursed for the same expenses by another source.

Alternative Cash Payment

Instead of submitting a Claim Form for Documented Economic Losses, Settlement Class Members can make a Claim for a single fifty dollar and zero cents (\$50.00) cash payment. No supporting documentation is required.

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

Credit Monitoring

In addition to the Monetary Compensation, you may also submit a Claim Form to receive three years of CyEx Medical Shield monitoring, which includes \$1,000,000 in identity theft protection insurance.

The actual amount of the Monetary Compensation may be prorated downwards if the settlement administration costs, attorneys' fees and expenses, service awards, Monetary Compensation, and the costs of Defendant's information security and systems remediation and improvements (which total \$225,000) exceed the aggregate cap of \$1,225,000, so that the total amount to be paid will not exceed \$1,225,000. To be clear, the overall settlement cap does not include the three years of CyEx Medical Shield monitoring.

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

Unless you exclude yourself (opt-out), you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders 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 Defendant or the Released Persons concerning the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

10. What are the Released Claims?

Section 13 of the Settlement Agreement describes the Releases, Released Claims, and Released Persons, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at **www.FCDGDataSettlement.com**. For questions regarding the Releases, Released Claims, or Released Persons 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 any Settlement benefits as described above. Your Claim Form must be submitted online at **www.FCDGDataSettlement.com** by **January 28, 2026**, or mailed to the Settlement Administrator at the address on the Claim Form, **postmarked by January 28, 2026**. Claim Forms are also available at **www.FCDGDataSettlement.com** or by calling **1- 888-344-7952** or by writing to:

First Choice Dental Data Security Incident
Settlement Administrator
P.O. Box 59479
Philadelphia, PA 19102-9479
Email: FCDGDataSettlement@rg2claims.com

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:

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

First Choice Dental Data Security Incident
RG/2 Claim Administration P.O. Box 59479
Philadelphia, PA 19102-9479
Email: FCDGDataSettlement@rg2claims.com

13. When will I receive my Settlement benefits?

If you submit a timely and valid Claim Form, the Settlement 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.FCDGDataSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes, the Court has appointed Raina C. Borrelli of Strauss Borrelli PLLC and David S. Almeida of Almeida Law Group LLC 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 and expense if you want someone other than Class Counsel to represent you in this lawsuit.

15. How will Class Counsel be paid?

Class Counsel will ask the Court to award attorneys' fees of \$475,000.00 to be paid by or on behalf of Defendant. Class Counsel will also ask the Court to approve a service award of \$2,000 for each of the Class Representatives for participating in this lawsuit and for their efforts in achieving the Settlement. The Court may award less than these amounts.

Class Counsel's motion for attorneys' fees, costs, and expenses, and the service award will be made available on the Settlement Website at www.FCDGDataSettlement.com before the deadline for you to comment or object to the Settlement.

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 Persons on your own concerning the Released Claims, then you must take steps to not be included in the Settlement. This is called excluding yourself from—or “opting-out” of—the Settlement.

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

To exclude yourself from the Settlement, you must mail a written request for exclusion, which must: (a) state the Settlement Class Member's full name, address, and telephone number; (b) contain the Settlement Class Member's personal and original signature (or the original signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on behalf of the Settlement Class Member with respect to a claim or right, such as those in the lawsuit); (c) clearly manifest the Settlement Class Member's intent to be excluded from the Settlement Class, to be excluded from the Settlement, to not participate in the Settlement, and/or to

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

waive all rights to the benefits of the Settlement; and (d) be postmarked no later than the final date of the Opt-Out Period.

The exclusion request must be **mailed** to the Settlement Administrator at the following address, and be **postmarked** by **DECEMBER 29, 2025**:

First Choice Dental Data Security Incident
Settlement Administrator
ATTN: Exclusion
P.O. Box 59479
Philadelphia, PA 19102-9479

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

Settlement Class Members will only be able to submit an opt-out request on their own behalf; mass or class opt-outs will not be permitted.

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

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

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

No. Unless you opt-out, you give up any right to sue any of the Released Persons 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 your own lawsuit or be part of any other lawsuit against the Released Persons concerning the Released Claims in this Settlement. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court 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 or requested attorneys' fees, costs, and expenses. You can also give reasons why you think the Court should not approve the Settlement or attorneys' fees, costs, and expenses or the service award.

To object, you must mail a written objection **postmarked** by **DECEMBER 29, 2025**, to Class Counsel and Defendant's Counsel, stating that you object to the Settlement in *Kelly Gorder, et al., v. FCDG Management, LLC d/b/a First Choice Dental*, Case No. 2024CV002164.

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

- (i) state the objecting Settlement Class Member's full name, current address, telephone number, and email address (if any);
- (ii) contain the objecting Settlement Class Member's original signature;
- (iii) set forth information identifying the objector as a Settlement Class Member, including proof that the objector is within the Settlement Class (e.g., copy of the Notice or copy of original notice of the Data Incident);

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

- (iv) set forth a statement of all grounds for the objection, including any legal support for the objection that the objector believes applicable;
- (v) identify all counsel representing the objector;
- (vi) state whether the objector and/or his or her counsel will appear at the Final Approval Hearing, and;
- (vii) contain the signature of the objector's duly authorized attorney or other duly authorized representative (if any), along with documentation setting forth such representation.

To object, your written objection must include all of the information above, must be postmarked by **December 29, 2025**, and sent by U.S. mail to Class Counsel and Defendant's Counsel, at the following addresses:

CLASS COUNSEL	DEFENDANT'S COUNSEL
Raina C. Borrelli STRAUSS BORRELLI PLLC 980 N Michigan Avenue, Suite 1610 Chicago, Illinois 60611 David S. Almeida ALMEIDA LAW GROUP LLC 849 W. Webster Avenue Chicago, IL 60614	Lucas T. Tabor WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP 555 East Wells Street, Suite 1730 Milwaukee, WI 53202 David M. Ross WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP 1500 K Street NW, Suite 330 Washington, DC 20005

20. 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 FINAL FAIRNESS HEARING

The Court will hold a "Final Fairness Hearing" to decide whether to approve the Settlement and attorneys' fees, costs, and expenses, and service award. 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 Fairness Hearing on **January 12, 2026, at 9:00 a.m.** before the Honorable Benjamin Jones at Dane County Courthouse, 215 S Hamilton St., Madison WI 53703. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses, and the service award to the Class Representatives.

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

Questions? Go to www.FCDGDataSettlement.com or call 1- 888-344-7952

Note: The date and time of the Final Fairness 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.FCDGDataSettlement.com** to confirm the date and time of the Final Fairness Hearing have not changed.

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

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

23. May I speak at the Final Fairness Hearing?

Yes, as long as you do not exclude yourself (opt-out), you can (but do not have to) participate and speak for yourself at the Final Fairness Hearing. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you at the hearing, you must follow all of the procedures for objecting to the Settlement listed above—and specifically include a statement whether you or your lawyer will appear at the Final Fairness 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 any Settlement benefits, and you will give up rights explained in the “Exclude Yourself or Opt-Out from the Settlement” section of this Notice, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against any of the Released Persons concerning the legal issues in this lawsuit that are released by the Settlement Agreement relating to the Data Incident.

GET 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, related documents and additional information are available at **www.FCDGDataSettlement.com** or by calling toll-free **1-888-344-7952**, or by writing to:

First Choice Dental Data Security Incident
Settlement Administrator
P.O. Box 59479
Philadelphia, PA 19102-9479
Email: FCDGDataSettlement@rg2claims.com

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

Questions? Go to www.FCDGDataSettlement.com or call 1-888-344-7952