

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Mohammed Hasanat v. Mana Products Inc.

Case No. 710156/2024

Supreme Court of the State of New York, County of Queens

**IF YOU WERE IMPACTED BY THE SEPTEMBER 2023
MANA PRODUCTS DATA SECURITY INCIDENT,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO CERTAIN BENEFITS.**

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 the Mana Products Inc. (“Mana” or “Defendant”) in a class action lawsuit. This class action lawsuit concerned the targeted cyberattack on Mana's computer systems that occurred on or about September 2, 2023 (the “Data Security Incident”). A limited number of files that contained private information were potentially accessed and/or acquired by an unknown third party without authorization. These files may have contained personal information such as names and Social Security Numbers.
- The lawsuit is captioned *Mohammed Hasanat v. Mana Products Inc.*, Case No. 710156/2024, pending in the Supreme Court of the State of New York, County of Queens (the “Action”).
- Mana 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.
- Mana's records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Mana.
- 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	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.ManaProductsSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	NOVEMBER 13, 2025
OPT OUT OF THE SETTLEMENT	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 the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	OCTOBER 14, 2025
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 benefits.	OCTOBER 14, 2025
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 from this Settlement and 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 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.

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Basic Information

1. Why was this Notice issued?

The Supreme Court of the State of New York, County of Queens, 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 captioned *Mohammed Hasanat v. Mana Products Inc.*, Case No. 710156/2024, pending in the Supreme Court of the State of New York, County of Queens. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the entity they sued, Mana Products Inc., is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the September 2, 2023, targeted cyberattack on Mana's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names and Social Security Numbers.

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 Settlement, the Class Representative is Mohammed Hasanat, and everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff 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 Class Members to receive

benefits from the Settlement. Plaintiff and their attorney think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: “all individuals residing in the United States whose Personal Information was compromised in the Data Security Incident experienced by Mana Products Inc. which began on or around September 2, 2023, including all those who received notice of the Data Security Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s family and staff, (2) Mana and related companies and corporate directors; (3) anyone who validly excludes themselves from the Settlement; and (4) anyone who perpetrated the cyberattack.

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

- Email: info@ManaProductsSettlement.com
- Call toll free, 24/7: (844) 496-0787
- By mail:

Mana 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.ManaProductsSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Mana will pay for the benefits described below. You are not limited to one benefit. You may file a claim for each benefit that you qualify for.

BENEFITS

Credit Monitoring Services. All Class Members are eligible to receive two years of Credit Monitoring Services from the three credit bureaus. This benefit will include \$1,000,000.00 of identity theft protection insurance.

Cash Benefits. There are three types of Cash Benefits claims:

- Documented Out-of-Pocket Expenses
- Reimbursement for Lost Time

- Documented Extraordinary Expenses

Mana will pay up to \$200,000.00 for these three benefits. This amount is expected to be enough to cover all Cash Benefits claims. However, if it turns out not to be enough, all Cash Benefits payments will be reduced *pro rata*.

Documented Out-of-Pocket Expenses. If you incurred actual, documented out-of-pocket expenses because of the Data Security Incident, you can get back up to \$400.00.

This benefit covers out-of-pocket expenses like:

- (1) attorney or accountant fees;
- (2) fees for credit reports, credit monitoring, or credit repair;
- (3) fees for freezing or unfreezing credit;
- (4) miscellaneous expenses like notary, postage, or copying.

You must provide receipts or other proofs of expenses. You can include “self-prepared” documents to explain or support other submitted documentation, but self-prepared documents by themselves are not sufficient for a valid claim.

If you also claim Reimbursement for Lost Time, below, the combined total is capped at \$400.00.

Reimbursement for Lost Time. If you spent time fixing problems caused by the Data Security Incident, you can get back \$20.00 per hour for up to 4 hours (up to \$80.00). You need to have spent at least 1 full hour on these problems.

To claim this benefit, list on the Claim Form what you did and how much time each task took. You must attest, under penalty of perjury, that the tasks were related to the Data Security Incident.

If you also claim Documented Out-of-Pocket Expenses, above, the combined total is capped at \$400.00.

Documented Extraordinary Expenses. You can get back up to \$4,000.00 if you experienced fraud or identity theft. This benefit applies if:

- (1) you have actual, documented expenses; and
- (2) the expenses were probably because of the Data Security Incident; and
- (3) the expenses happened after September 2, 2023; and
- (4) the expenses are not already covered by the Out-of-Pocket or Lost Time benefits; and
- (5) you tried your best to avoid the expenses, or to get your money back.

You must provide receipts or other proofs of expenses. You can include “self-prepared” documents to explain or support other submitted documentation, but self-prepared documents by themselves are not sufficient for a valid claim.

Alternative Cash Payment. Instead of all the other benefits described above, you can claim a one-time \$25.00 cash payment. Do not claim any other benefits if you claim the Alternative Cash Payment. You do not have to provide any proofs or additional information 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@ManaProductsSettlement.com
- Call toll free, 24/7: (844) 496-0787
- By mail:

Mana 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 Class?

Unless you opt out of the Settlement (*see Question 15*), you won't be able to sue the Defendant or be part of any other lawsuit about the same legal issues this Settlement covers. The "Releases" section of the Settlement Agreement (Section IX) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.ManaProductsSettlement.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.ManaProductsSettlement.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at:

Mana 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, (844) 496-0787, by email info@ManaProductsSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

Online Claim Forms must be submitted by **November 13, 2025**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, with documentation, must be postmarked by **November 13, 2025**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **December 11, 2025, 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.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court appointed attorneys Cassandra P. Miller of Strauss Borrelli PLLC, to represent you and other 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 \$120,000 in attorneys’ fees and costs, which will be paid directly by Mana.

Class Counsel will also ask for Service Award of \$5,000.00 for the Class Representative. The Service Award will be paid directly by Mana.

Excluding Yourself 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 a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive a Settlement payment, but you will keep any rights you may have to sue Mana on your own about the legal issues in this case.

If you exclude yourself, 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 exclude yourself.

The deadline to exclude yourself from the Settlement is **October 14, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Action: *Mohammed Hasanat v. Mana Products Inc.*, Case No. 710156/2024, pending in the Supreme Court of the State of New York, County of Queens;
- (2) your full name and mailing address;
- (3) personal signature; and
- (4) the words “Request for Exclusion” 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:

Mana Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226

Your Request for Exclusion must be submitted, postmarked, or emailed by **October 14, 2025**.

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 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 excluded yourself from the Settlement (*see* **Question 15**)

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

- (1) the name of the Action: *Mohammed Hasanat v. Mana Products Inc.*, Case No. 710156/2024, pending in the Supreme Court of the State of New York, County of Queens;
- (2) your full name and mailing address;
- (3) information that proves that you are a Class Member (such as a copy of a notice you received about the Data Security Incident);
- (4) a clear description of all the reasons you object; include any legal support you may have for your objection;
- (5) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;
- (6) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (7) if you or your attorney have objected in any other case in the past three years, list those cases;
- (8) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, 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 **October 14, 2025**. You must also send copies of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 88-11 Sutphin Boulevard Jamaica New York, 11435	Mana 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 exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and 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 hearing on **December 11, 2025, at 10:00 a.m.**, in Supreme Court of the State of New York, County of Queens, Part 36 Courtroom 46 88-11 Sutphin Boulevard, Jamaica, New York.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award Service Award to the Class Representative who brought this Action on behalf of the Class. The Court will also consider any objections to the Settlement.

If you are a 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.ManaProductsSettlement.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.ManaProductsSettlement.com.

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

- Email: info@ManaProductsSettlement.com
- Call toll free, 24/7: (844) 496-0787
- By mail:

Mana 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, 88-11 Sutphin Boulevard Jamaica New York, 11435.

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