

Notice of York County School of Technology Data Incident Class Action Settlement

*This is not a solicitation from a lawyer.
Please read this Notice carefully and completely.*

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

A proposed Settlement arising out of a data breach has been reached with York County School of Technology (“York” or “Defendant”). On or about March 27, 2023 and April 26, 2023, cyber criminals gained unauthorized access to Defendant’s network and Settlement Class Members’ Private Information was exfiltrated (the “Data Incident”). Private Information includes, but is not limited to, Settlement Members’ full names, addresses, Social Security numbers, and Driver’s Licenses or State IDs. The Settlement Class includes all natural persons in the United States whose Private Information was accessed as a result of the Data Incident, including those who were sent a notice from York of the Data Incident.

- If you are a Settlement Class Member, you may be able to receive **one** of the following Settlement Benefits:

Cash Payment for Out-of-Pocket Losses: Cash payment of up to \$5,000 per Settlement Class Member for reimbursement of certain documented Out-of-Pocket Losses related to the Data Incident and time spent dealing with it;

OR

Alternative Cash Payment: A flat cash payment in the amount of \$45.00 with no documentation.

The Settlement Administrator shall have discretion to treat invalid Cash Payment for Out-of-Pocket Losses Payment claims as claims for Alternative Cash Payments.

- Your legal rights will be affected whether you act or do not act. You should read this entire Notice carefully.

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT: | |
|---|---|
| FILE A CLAIM FORM SUBMITTED OR POSTMARKED BY: NOVEMBER 21, 2025 | <p>You must file a Claim Form to receive any of the benefits provided by this Settlement, including a Cash Payment for Out-of-Pocket Losses, or an Alternative Cash Payment (collectively, the “Settlement Benefits”).</p> <p>Submitting a timely and valid Claim Form is the only way that you can receive Settlement Benefits. If you submit a Claim Form, you will give up the right to sue York and the Released Parties (as defined in the Settlement Agreement) in a separate lawsuit about the legal claims this Settlement resolves.</p> |
| EXCLUDE YOURSELF FROM THIS SETTLEMENT POSTMARKED BY: NOVEMBER 21, 2025 | <p>This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against York and the Released Parties, for the legal claims this Settlement resolves.</p> <p>If you exclude yourself, you will give up the right to receive any Settlement Benefits from this Settlement.</p> |
| OBJECT TO OR COMMENT ON THE SETTLEMENT | <p>You may object to the Settlement by writing to the Court and informing it why you do not think the Settlement should be approved. You can also write the Court to provide comments or reasons why you support the Settlement. You will still</p> |

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| POSTMARKED BY: NOVEMBER 21, 2025 | be bound by the Settlement if it is approved, and you will not be allowed to exclude yourself from the Settlement. If you object, you may also file a Claim Form to receive Settlement Benefits, but you will give up the right to sue York and the Released Parties in a separate lawsuit about the legal claims this Settlement resolves. |
| GO TO THE “FINAL APPROVAL” HEARING DATE: DECEMBER 2, 2025 | You may attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must make a request to do so in your written objection or comment. You are <u>not</u> required to attend the Final Approval Hearing. |
| DO NOTHING | If you do nothing, you will not receive a cash payment and you will give up your rights to sue York and the Released Parties for the legal claims this Settlement resolves. |

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this lawsuit still has to decide whether to approve the Settlement. No Settlement Benefits or payments will be provided unless the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. Why did I get this Notice?

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

The lawsuit is known as *Luke Heflin, et al. v. York County School of Technology*, Case No. 2024-SU-001254, York County Court of Common Pleas (the “Action”) before the Honorable Matthew D. Menges. The individual who filed this Action is called the “Plaintiff” and the entity they sued, York County School of Technology, is called the “Defendant.” The Plaintiff and the Defendant agreed to this Settlement.

2. What is this Action about?

Plaintiff filed this Action against Defendant, individually, and on behalf of members of the Settlement Class whose Private Information, including full name, address, Social Security number, and Driver’s Licenses or State IDs were accessed as a result of the Data Incident.

Plaintiff alleges that between on or about March 27, 2023 and April 26, 2023, cyber-criminals gained unauthorized access to the Defendant’s network and Private Information of certain Defendant’s former and current students, employees, or applicants for admission or employment was exfiltrated. Plaintiff brought this Action against Defendant.

The Plaintiff claims that York failed to adequately protect their Private Information and that they were injured as a result. York denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that the law has been violated. York denies these and all other legal claims made in the Action. By entering into the Settlement, York is not admitting that it did anything wrong.

Questions? Go to www.YorkDataSettlement.com or call 1-(844) 496-1097.
This Settlement affects your legal rights even if you do nothing.

3. Why is this a class action?

In a class action, one or more people called the “Class Representative(s)” sue on behalf of all people who have similar legal claims. Together, all of these people are called a “Settlement Class” or “Settlement Class Members.” One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who exclude themselves (opt out) from the Settlement Class.

The Class Representative in this Action is Luke Heflin.

4. Why is there a Settlement?

The Class Representative and York do not agree about the legal claims made in this Action. The Action has not gone to trial, and the Court has not decided in favor of the Class Representative or York. Instead, the Class Representative and York have agreed to settle the Action. The Class Representative, Defendant, and their lawyers believe the Settlement is best for all Settlement Class Members because of the benefits available to Settlement Class Members and the risks and uncertainty associated with continuing the Action.

WHO IS INCLUDED IN THE SETTLEMENT

5. How do I know if I am part of the Settlement?

The Settlement Class includes all natural persons in the United States whose Private Information was accessed as a result of the Data Incident, including those who were sent notification from Defendant of the Data Incident.

If you have any questions as to whether you are a Settlement Class Member, you may contact the Settlement Administrator.

6. Are there exceptions to individuals who are included as Settlement Class Members in the Settlement?

Yes. Excluded from the Settlement Class are: (a) all persons who are governing board members of the Defendant; (b) governmental entities; and (c) the Court and any Judge(s) presiding over this matter, the Court’s immediate family, and Court staff.

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 the Settlement Website at www.YorkDataSettlement.com or call the Settlement Administrator’s toll-free number at **(844) 496-1097**.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

If you are a Settlement Class Member and you submit a timely and valid Claim Form, you may be eligible to receive one of the following Settlement Benefits:

- (A) **Cash Payment for Out-of-Pocket Losses**—Settling Class Members that provide documented evidence for reimbursement of Out-of-Pocket Losses directly attributable to the Data Incident may be reimbursed up to a total of \$5,000.00, including. As part of the Out-of-Pocket Losses, Settling Class Members may submit a claim for reimbursement of time spent remediating losses attributable to the Data Incident, up to four (4) hours at twenty dollars (\$20) per hour and for any mitigation measures undertaken after March 27, 2023, such as purchasing credit monitoring services, fraud resolution services, and professional services incurred to address identity theft or fraud.

Questions? Go to www.YorkDataSettlement.com or call 1-(844) 496-1097.

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OR

(B) Alternative Cash Payment—A flat cash payment in the amount of \$45.00 with no documentation (“Alternative Cash Payment”).

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 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 legal issues in this Action that are released by this Settlement. 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 Released Claims and the Release, in necessary legal terminology, so please read these sections carefully. The Settlement Agreement is available at **www.YorkDataSettlement.com**. For questions regarding the Release or Released Claims and what the language in the Settlement Agreement means, you can also contact Class Counsel listed in Question 16 for free, or you can talk to your own lawyer at your own expense.

HOW TO GET SETTLEMENT BENEFITS—SUBMITTING A CLAIM FORM

11. How do I make a claim for Settlement Benefits?

You must submit a timely and valid Claim Form for the Settlement Benefits described in Question 8. Your Claim Form must be submitted online at **www.YorkDataSettlement.com** by **November 21, 2025**, or mailed to the Settlement Administrator at the address on the Claim Form, **postmarked by November 21, 2025**. Claim Forms are also available on the Settlement Website at **www.YorkDataSettlement.com** or by calling **1- (844) 496-1097** or by writing to:

York County School of Technology Data Breach Litigation
Settlement Administrator
PO Box 25226
Santa Ana, CA 92799

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:

York County School of Technology Data Breach Litigation
Settlement Administrator
PO Box 25226
Santa Ana, CA 92799

13. How do I make a claim for a Cash Payment for Out-of-Pocket Losses?

To file a claim for a cash payment of up to \$5,000 for certain Out-of-Pocket Losses related to the Data Incident and time spent dealing with it, you must submit a valid Claim Form electing to receive a Cash Payment for Out-of-Pocket Losses. To submit a claim for a Cash Payment for Out-of-Pocket Losses, you may either complete a Claim Form on the Settlement Website or print and mail a completed Claim Form to the Settlement Administrator, postmarked on or before **November 21, 2025**.

Questions? Go to www.YorkDataSettlement.com or call 1-(844) 496-1097.
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The Claim Form requires that you sign the attestation regarding the information you provided and that you include reasonable documentation supporting the losses and demonstrating that the losses are more likely than not related to the Data Incident. Examples of documentation include, but are not limited to, credit card statements, bank statements, invoices, telephone records, and receipts. To submit a valid claim for reimbursement of time spent remediating losses attributable to the Data Incident for up to four (4) hours at twenty dollars (\$20) per hour and for any mitigation measures undertaken after March 27, 2023, on the Claim Form you need to provide a brief description of the actions you took in response to the Data Incident.

If your claim for a Cash Payment for Out-of-Pocket Losses is rejected by the Settlement Administrator and you do not correct it, your claim for a Cash Payment for Out-of-Pocket Losses will instead be considered a claim for an Alternative Cash Payment.

Instructions for filling out a claim for a Cash Payment for Out-of-Pocket Losses are included on the Claim Form. You may access the Claim Form at **www.YorkDataSettlement.com**.

The deadline to file a claim for a Cash Payment for Out-of-Pocket Losses is **November 21, 2025**. Claims must be filed (or postmarked if mailed) by this deadline.

14. How do I make a claim for an Alternative Cash Payment?

To file a claim for an Alternative Cash Payment, you must submit a valid Claim Form electing to receive the Alternative Cash Payment. To submit a claim for an Alternative Cash Payment, you must complete a Claim Form on the Settlement Website or print and mail a completed Claim Form to the Settlement Administrator, postmarked on or before **November 21, 2025**.

If you wish to receive your payment via digital payment method options instead of a check, simply provide your email address (optional). Anyone who submits a valid claim for Alternative Cash Payment and does not elect to receive a digital payment will receive their payment via regular check sent through U.S. Mail.

Instructions for filling out a claim for an Alternative Cash Payment are included on the Claim Form. You may access the Claim Form at **www.YorkDataSettlement.com**.

The deadline to file a claim for an Alternative Cash Payment is **November 21, 2025**. Claims must be filed (or postmarked if mailed) by this deadline.

15. When will I receive my Settlement Benefits?

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

The approval process may take time. Please be patient and check **www.YorkDataSettlement.com** for updates.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes, the Court has appointed Benjamin F. Johns of Shub Johns & Holbrook LLP and Gary M. 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 and expense if you want someone other than Class Counsel to represent you in this Action.

17. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award Attorneys' Fees and Costs of up to \$225,000.00. Class Counsel will also ask the Court to approve a Service Award for the Class Representative of up to \$2,000 each for their efforts in achieving the Settlement. If awarded by the Court, the Attorneys' Fees and

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Costs, and the Service Award will be paid from the Settlement. The Court may award less than these amounts.

Class Counsel's application for the Attorneys' Fees and Costs and the Service Award will be made available on the Settlement Website at www.YorkDataSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any rights you may have to individually sue or continue to sue York and/or the Released Parties on your own about the legal claims in this Action or released by 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.

18. How do I get 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, email address (if any), and Unique ID Number provided on the mailed Notice;
- 2) The name of the attorney representing you for your request for exclusion (if any);
- 3) Your personal physical signature; and
- 4) A statement that you want to be excluded from the Settlement Class, such as “I hereby request to be excluded from the Settlement Class in *Luke Heflin, et al. v. York County School of Technology*”.

The exclusion request must be **mailed** to the Settlement Administrator at the following address, and be **postmarked by November 21, 2025**:

York County School of Technology Data Breach Litigation
Settlement Administrator
PO Box 25226
Santa Ana, CA 92799

You cannot exclude yourself (opt out) 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 request for exclusion hasn't been signed by each and every individual Settlement Class Member will not be allowed.

19. If I exclude myself, can I still get anything from the Settlement?

No. If you exclude yourself, you will not be entitled to receive Settlement Benefits, but you will not be bound by the Settlement or any judgment in this Action. You can only get Settlement Benefits if you stay in the Settlement and submit a timely and valid Claim Form.

20. If I do not exclude myself, can I sue York for the same thing later?

No. Unless you exclude yourself, you give up any right to individually sue any of the Released Parties for the legal claims this Settlement resolves and Releases relating to the Data Incident. You must exclude yourself from this Action to start or continue with your own Action or be part of any other Action against the Released Parties. If you have a pending Action, speak to your lawyer in that case immediately.

OBJECT TO OR COMMENT ON THE SETTLEMENT

21. 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 object to all or any part of the Settlement.

Questions? Go to www.YorkDataSettlement.com or call 1-(844) 496-1097.
This Settlement affects your legal rights even if you do nothing.

To object, you must send by U.S. mail to the Clerk of the Court, Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked by or shipped by private courier (such as Federal Express) by **November 21, 2025** stating you object to the Settlement in *Luke Heflin, et al. v. York County School of Technology*, Case No. 2024-SU-001254.

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, 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 as the objector or your own lawyer;
- 3) The number of times you have objected to a class action settlement within the 5 years preceding the date that you file the objection, the caption of each case in which you have made an objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- 4) The identity of any lawyers representing you in connection with the objection, 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 Awards;
- 5) The number of times in which your lawyer or your lawyer's law firm have objected to a class action settlement within the 5 years preceding the date of the filed objection, the caption of each case in which your lawyer or the firm has made the objection and a copy of any orders related to or ruling upon your lawyer's or the lawyer's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your lawyer and/or lawyer's law firm have objected to a class action settlement within the preceding 5 years;
- 6) Any and all agreements that relate to the objection or the process of objecting—whether written or oral—between you and/or your lawyer and any other person or entity;
- 7) The identity of all lawyers (if any) representing you who will appear at the Final Approval Hearing;
- 8) A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- 9) A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- 10) Your signature as the objector (a lawyer's signature is not sufficient).

To be timely, written notice of an objection including all of the information above must be mailed to Clerk of the Court, Class Counsel, Defendant's Counsel, and the Settlement Administrator by **November 21, 2025** at the following addresses:

| COURT | CLASS COUNSEL | DEFENDANT'S COUNSEL | SETTLEMENT ADMINISTRATOR |
|--|--|--|---|
| Clerk of Court York County Judicial Center 45 N. George Street York, PA 17401 | Benjamin F. Johns Shub Johns & Holbrook LLP 200 Barr Harbor Drive Suite 400 Conshohocken, PA 19428 | Timothy Lowe McDonald Hopkins PLC 39533 Woodward Avenue, Suite 318 Bloomfield Hills, MI 48304 | York Data Incident Litigation Settlement Administrator PO Box 25226 Santa Ana, CA 92799 |

If you fail to comply with the requirements for objecting as detailed above, you waive and forfeit any and all rights you may have to appear separately and/or to object to the Settlement and you will be bound by all the terms of the Settlement and by all proceedings, orders, and judgments in the Action.

Questions? Go to www.YorkDataSettlement.com or call 1-(844) 496-1097.
This Settlement affects your legal rights even if you do nothing.

22. What is the difference between objecting and requesting exclusion?

Objecting is simply telling the Court you do not like something about the Settlement or the requested attorneys' fees and costs. You can object only if you stay in the Settlement Class (meaning you do not request exclusion from the Settlement). Requesting exclusion from the Settlement is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you request exclusion, you cannot object to the Settlement because it no longer affects you.

THE FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing on **December 2, 2025, at 9:30am** before the Honorable Matthew D. Menges of the York County Judicial Center, 45 N. George Street, York, PA 17401.

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.YorkDataSettlement.com** to confirm the date and time of the Final Approval Hearing has not changed.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement, Class Counsel's application for Attorneys' Fees and Costs, and the Service Award to the Class Representative. 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 Final Approval Hearing, the Court will also listen to you or your lawyer speak at the hearing, if you so request.

24. Do I have to come 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 submit an objection, you do not have to come to the Final Approval Hearing to talk about it. As long as you mail your written objection on time the Court will consider it.

25. May I speak at the Final Approval Hearing?

Yes, as long as you do not exclude yourself (opt out) and you submit a timely written objection requesting to speak at the hearing, you can (but do not have to) participate and speak for yourself at the Final Approval 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 in Question 21 above—and specifically include a statement whether you and your lawyer will appear at the Final Approval Hearing.

IF YOU DO NOTHING

26. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive Settlement Benefits, and you will give up rights explained in the "Opting 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 Parties about the legal issues in this Action that are released by the Settlement relating to the Data Incident.

Questions? Go to **www.YorkDataSettlement.com** or call 1-(844) 496-1097.
This Settlement affects your legal rights even if you do nothing.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed Settlement. For more details about the Settlement, please see the Settlement Agreement and other related documents available at **www.YorkDataSettlement.com**, by calling toll-free **1- (844) 496-1097**, by contacting Class Counsel, or by visiting the office of the Clerk's Office, York County Judicial Center, 45 N. George Street, York, PA 17401, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

If you have questions about the proposed Settlement or anything in this Notice, you may contact the Settlement Administrator at:

York County School of Technology Data Breach Litigation
Settlement Administrator
PO Box 25226
Santa Ana, CA 92799

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

Questions? Go to **www.YorkDataSettlement.com** or call 1-(844) 496-1097.
This Settlement affects your legal rights even if you do nothing.