

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In the State Court of Fulton County, State of Georgia
Lencola Roberts, et al., v. Hire Velocity, LLC, Case No. 26EV000358

Were you notified that your Private Information may have been impacted by a data breach at Hire Velocity? You may be eligible for benefits from a class action settlement.

A Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A proposed settlement has been reached with Hire Velocity, LLC (the “Defendant”) in a class action about a cybersecurity incident on or about February 17, 2025, that allowed unauthorized access to company computer systems and files containing Private Information belonging to certain employees, contractors, and clients (the “Data Incident”). This Private Information included first and last names and Social Security numbers. The Defendant denies all of the Plaintiffs’ claims and maintains that it did not do anything wrong.
- You are included in this Settlement as a Settlement Class Member if you live in the United States and were sent a written notice from the Defendant that your Private Information may have been compromised in the Data Incident affecting the Defendant in approximately February 2025.
- Under the proposed Settlement, the Defendant will pay all Settlement Class Member Benefits, including Cash Payments and Credit Monitoring for Settlement Class Members, Settlement Administration Costs, and any Court-awarded, Attorneys’ Fees, Costs, and Service Awards.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive Settlement Class Member Benefits is to submit a valid and timely Claim Form.	November 30, 2026
OPT-OUT OF THE SETTLEMENT	If you opt-out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant about the claims resolved by this Settlement. You will not receive Settlement Class Member Benefits.	November 16, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt-out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for Settlement Class Member Benefits.	November 16, 2026
DO NOTHING	If you do nothing, you will not receive Settlement Class Member Benefits and you give up the right to sue the Defendant about the 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 must decide whether to approve the Settlement.

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BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all of your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *Lencola Roberts, et al., v. Hire Velocity, LLC*, Case No. 26EV000358 pending in the State Court of Fulton County, Georgia. The people who filed this Action are called the “Plaintiffs” and the company they sued, Hire Velocity, LLC, is called the “Defendant.”

2. What is this Action about?

On or about February 17, 2025, the Defendant became aware of a cybersecurity incident in which suspicious activity on its computer systems and network disrupted access to certain systems (the “Data Incident”). On or about April 15, 2025, the Defendant became aware that a third party may have unlawfully accessed certain files containing Private Information belonging to certain employees, contractors, and clients. This Private Information included first and last names and Social Security numbers. On or about May 16, 2025, the Defendant sent out notice letters to those individuals impacted by the Data Incident. The Action alleges claims of negligence, negligence *per se*, breach of implied contract, unjust enrichment, breach of confidence, and declaratory relief. The Defendant denies all of the Plaintiffs’ claims and maintains that it did not do anything wrong.

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 who sue are known as “Class Representatives” or Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Action, the Class Representatives are Lencola Roberts, Celestino Sanchez II, and Ginger Wagner.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. The Defendant denies all claims and contends that it has not violated any laws. The Plaintiffs and the Defendant agreed to a Settlement to avoid the costs and risks of a trial, and, through the Settlement, Settlement Class Members are eligible to claim benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members as “Class Counsel,” think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all living individuals residing in the United States who were sent a written notice from the Defendant that their Private Information may have been compromised in the Data Incident affecting the Defendant in approximately February 2025.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (a) all persons who are directors and officers of the Defendant; (b) governmental entities; (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and Settlement Class Members who timely and validly opt-out of the Settlement.

THE SETTLEMENT BENEFITS

7. What can I get from this Settlement?

Under the proposed Settlement, the Defendant will pay all Settlement Class Member Benefits, including Cash Payments and Credit Monitoring for Settlement Class Members, Settlement Administration Costs, and any Court-awarded Attorneys' Fees, Costs, and Service Awards.

Settlement Class Members may choose to receive one (1) of the following Cash Payments:

- (1) **Cash Payment A – Out-of-Pocket Losses:** Reimbursement of up to \$2,000 for documented out-of-pocket losses arising from the Data Incident; or
- (2) **Cash Payment B – Alternate Cash:** An alternate cash payment of \$40.

In addition to Cash Payment A or Cash Payment B, you may also make a claim for two years of **Credit Monitoring**.

8. Tell me more about Cash Payment A – Out-of-Pocket Losses.

Settlement Class Members may choose to receive up to \$2,000 for reimbursement for Out-of-Pocket Losses arising from the Data Incident. Reasonable documentation must be provided. Losses include, but are not limited to:

- Losses associated with 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 May 16, 2025 through November 15, 2026; and
- Miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

Examples of "reasonable documentation" include telephone records, correspondence including emails, or receipts. Personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute reasonable documentation but may be included to provide clarification, context, or support for other submitted reasonable documentation. If you do not provide sufficient reasonable documentation and fail to cure your Claim for Out-of-Pocket Losses, it will be denied.

You cannot be reimbursed for expenses under this Settlement if you have been reimbursed for the same expenses by another source, including compensation provided in connection with any credit monitoring and identity theft protection product.

9. Tell me more about Cash Payment B – Alternate Cash.

Instead of Cash Payment A, Settlement Class Members may choose to receive an alternate cash payment of \$40 (Cash Payment B). No documentation is required for Cash Payment B.

10. Tell me more about Credit Monitoring.

In addition to Cash Payment A or Cash Payment B above, Settlement Class Members may choose to receive two years of Credit Monitoring which provides three bureau credit monitoring, single bureau credit report, comprehensive dark web monitoring, Social Security Number scan, high risk transaction monitoring, with real-time alerts, security freeze, and \$1 million in insurance coverage.

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

Unless you opt-out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant or other Released Parties about any of the legal claims this Settlement resolves. The Releases section in the Settlement Agreement describes the legal claims relating to the Data Incident that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.HireVelocitySettlement.com.

HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM

12. How do I submit a Claim Form to get Settlement Class Member Benefits?

To receive Settlement Class Member Benefits, you must submit a Claim Form, with any necessary documentation, online by **November 30, 2026 at 11:59 p.m. ET** at www.HireVelocity.com, or by mail, postmarked by **November 30, 2026**, to:

Roberts v. Hire Velocity, LLC
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

13. When will I get my Settlement Class Member Benefits?

The short answer is – after the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **December 15, 2026, at 10:00 a.m. ET**, to decide whether to approve the Settlement, the Attorneys’ Fees and Costs Payment for Class Counsel for representing the Settlement Class, and Service Awards to the three Class Representatives who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Class Member Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes, the Court appointed Raina C. Borrelli of Strauss Borrelli PLLC, Casandra Turner of Milberg, PLLC, and Jonathan M. Streisfeld of Kopelowitz Ostrow P.A as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Defendant (subject to Court approval). If you want to be represented by your own lawyer, you may hire one at your own expense.

15. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court to approve an Application for Attorneys’ Fees and Costs of \$185,000 as well as a \$4,000 Service Award payment to each of the three Class Representatives. If approved, these amounts will be separately paid from Settlement Class Member Benefits.

EXCLUDE YOURSELF FROM THE SETTLEMENT

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

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out” of the Settlement Class. The deadline to opt-out of the Settlement by submitting a “request to opt-out” is **November 16, 2026**.

To opt-out from the Settlement, you must submit a written request to opt-out that includes:

- A statement indicating that you want to be excluded from the Settlement Class, such as, “I hereby request to be excluded from the proposed Settlement Class in *Lencola Roberts, et al., v. Hire Velocity, LLC, Case No. 26EV000358*”;
- Your full name, address, telephone number, and email address (if any);
- Your personal signature.

Your request to opt-out must be mailed to the Settlement Administrator at the address below, postmarked no later than **November 16, 2026**.

Roberts v. Hire Velocity, LLC
c/o Kroll Settlement Administration LLC
ATTN: Opt-Out Request
P.O. Box 225391
New York, NY 10150-5391

OBJECT TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the Attorneys’ Fees and Costs Payment amount, the Service Award payments, the Releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement. Objections must be submitted in writing and must include:

- Your full name, mailing address, telephone number, and email address (if any);
- All grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
- The number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector’s prior objections that were issued by the trial and appellate courts in each listed case
- The identity of all counsel (if any) representing you, including any former or current counsel 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;
- The number of times in which the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel’s or the counsel’s law firm’s prior objections that were issued by the trial and appellate courts in each listed case in which the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the preceding five years;
- the identity of all counsel (if any) representing the objector that will appear at the Final Approval Hearing;
- A list of all persons who will be called to testify at the Final Approval Hearing in support of your objection (if any);
- A statement whether you intend to personally appear or testify at the Final Approval Hearing; and
- Your signature (an attorney’s signature is not sufficient).

Objections must be filed with the Court at the following address no later than **November 16, 2026**.

State Court of Fulton County, Georgia
185 Shirley C. Franklin Blvd, S.W.
Suite J1-G400
Atlanta, GA 30303

A copy of your objection also must be mailed to Class Counsel, Defendant's Counsel, and the Settlement Administrator at the addresses below, postmarked no later than **November 16, 2026**.

CLASS COUNSEL	DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Raina C. Borrelli Strauss Borrelli PLLC One Magnificent Mile 980 N. Michigan Ave. Suite 1610 Chicago, IL 60611 Casondra Turner Milberg, PLLC 260 Peachtree Street NW Suite 2200 Atlanta, GA 30303 Jonathan M. Streisfeld Kopelowitz Ostrow P.A. 1 West Las Olas Blvd. Suite 500 Fort Lauderdale, FL 33301	John Babione Constangy, Brooks, Smith & Prophete, LLP 230 Peachtree Street NW Suite 2400 Atlanta, GA 30303	<i>Roberts v. Hire Velocity, LLC</i> c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box 225391 New York, NY 10150-5391

19. What is the difference between objecting and opting out?

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 it. Opting out from the Settlement means telling the Court 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

20. When is the Court's Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **December 15, 2026 at 10:00 a.m. ET**, in Courtroom 2F at the Fulton County Courthouse, 185 Shirley C. Franklin Blvd, S.W., Atlanta, GA, 30303, to decide whether to approve the Settlement, Class Counsel's Application for Attorneys' Fees and Costs, and the Service Awards to the three Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.HireVelocitySettlement.com for updates.

21. 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 file an objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement Agreement and will not be eligible to receive any Settlement Class Member Benefits.

GETTING MORE INFORMATION

23. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.HireVelocitySettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator toll free at (833) 930-1179 or by mail at *Roberts v. Hire Velocity, LLC*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.