

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*In re Hospital Sisters Health System Data Breach Litigation*

Case No. 2024CH000043

Chancery Court of Sangamon County, Illinois

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE AUGUST 2023 HOSPITAL SISTERS HEALTH SYSTEM DATA BREACH, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS.**

*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 Hospital Sisters Health System (“HSHS” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on HSHS’s computer systems that occurred in August 2023 (the “Data Incident”). Certain files that contained personally identifiable information and personal health information were accessed.
- The lawsuit is called *In re Hospital Sisters Health System Data Breach Litigation*, Case No. 2024CH000043. It is pending in the Chancery Court of Sangamon County, Illinois (the “Litigation”).
- HSHS 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.
- HSHS’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 HSHS alerting you of the Data Incident.
- 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
<b>SUBMIT A CLAIM</b>	<p>The only way to receive benefits 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 <b>www.HSHSDataSettlement.com</b>. If you received a postcard notice of this settlement, simply fill out the claim form, tear it at the perforation, and place it in the mail postmarked on or before <b>November 14, 2025</b>.</p> <p>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.</p>	<b>November 14, 2025</b>
<b>OPT OUT OF THE SETTLEMENT</b>	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 by this Settlement. You can hire your own lawyer at your own expense.	<b>November 14, 2025</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	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.	<b>November 14, 2025</b>
<b>DO NOTHING</b>	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 Chancery Court of Sangamon County, Illinois, 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 *In re Hospital Sisters Health System Data Breach Litigation*, Case No. 2024CH000043. It is pending in the Chancery Court of Sangamon County, Illinois. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the entity they sued, Hospital Sisters Health System, is called the “Defendant.”

### 2. What is this lawsuit about?

This lawsuit alleges that during the August 2023 targeted cyberattack on HSHS’ computer systems, certain files that contained private information were accessed. These files may have contained personally identifiable information and personal health 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 Settlement, the Class Representatives are Teresa Bierman; Charles Bierman; Steven Durbin; Brittany Capers; Michelle Reichart; Sandra McCoy; Kim Wade; Nick Avery; and Charles Bouvard. Everyone included in this Action are the 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 Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys 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 persons whose personally identifiable information or personal health information was compromised in the data incident that occurred on HSHS’s network systems between August 16, 2023 and August 27, 2023 (i.e., the Data Incident, as previously defined), including all persons who were sent a notice of this data incident.”

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) HSHS’s officers and directors (unless such persons received a written notice of the Data Incident); (2) all Class Members to timely and validly opt out of the Settlement; (3) the judges assigned to the Litigation and to evaluate the fairness, reasonableness, and adequacy of this settlement; and (4) any other Person found by a court of competent jurisdiction to be guilty under criminal law of perpetrating, aiding or abetting the criminal activity occurrence of the Data Incident or who pleads *nolo contendere* to any such charge.

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@HSHSDataSettlement.com](mailto:info@HSHSDataSettlement.com)
- Call toll free, 24/7: 1- (844) 496-1105
- By mail: HSHS Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You may also view the Settlement Agreement at [www.HSHSDataSettlement.com](http://www.HSHSDataSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

HSHS will establish a Settlement Fund of \$7,600,000.00. The Settlement Fund will first be used to pay court-approved attorneys’ fees and costs, Service Award for the Plaintiffs, and the costs of administering the Settlement. The net remaining money will be used to pay for the benefits described below.

#### **BENEFITS**

**Financial Data Monitoring.** All Class Members are eligible to enroll in two years of **CyEx Financial Shield**. This comprehensive service comes with \$1 million financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- compromised bank and financial account numbers

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

**Cash Payments.** All Class Members are eligible for one of two payment options, described below.

**Option 1: Documented Losses.** If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$5,000.00**. The losses must have occurred between August 16, 2023, and November 14, 2025.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail

You need to send proof, like bank statements or 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.

**Option 2: Alternative Cash Payment.** Instead of the benefits in Option 1, you may claim a one-time pro rata cash payment.

It expected that a significant amount of money will remain in the Settlement Fund after all expenses and all other benefits have been paid. All of this remaining money will be divided equally between everyone who claims an Alternative Cash Payment. Once an estimate for how much this payment is available, it will provided on the Settlement Website.

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@HSHSDataSettlement.com](mailto:info@HSHSDataSettlement.com)
- Call toll free, 24/7: 1- (844) 496-1105
- By mail: HSHS Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

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

If you stay in the class, you won't be able to be part of any other lawsuit against HSHS about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section XV) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.HSHSDataSettlement.com](http://www.HSHSDataSettlement.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.HSHSDataSettlement.com](http://www.HSHSDataSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

HSHS Data Incident Settlement

c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (844) 496-1105, by email [info@HSHSDataSettlement.com](mailto:info@HSHSDataSettlement.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 **November 14, 2025**. 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 **November 14, 2025**.

### 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **December 4, 2025 @ 11:00am (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 the law firms of Cafferty Clobes Meriwether & Sprengel LLP; Milberg Coleman Bryson Phillips Grossman PLLC; Siri & Glimstead LLP; and Srourian Law Firm, P.C, 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 \$2,600,000.00 plus reasonable costs and expenses incurred, which will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award Payments of \$2,500.00 for each of the Class Representatives. Service Award Payments will also be paid from the Settlement Fund.

## 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 Settlement benefits or payment. However, you will keep any rights you may have to sue HSHS 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 **November 14, 2025**.

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

- (1) the name of the Litigation: *In re Hospital Sisters Health System Data Breach Litigation*, Case No. 2024CH000043, pending in the Chancery Court of Sangamon County, Illinois;
- (2) your full name, address, and telephone number;
- (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:

**HSHS Data Incident Settlement**  
**ATTN: Exclusion Request**  
**P.O. Box 25226**  
**Santa Ana, CA 92799-9958**

Your Request for Exclusion must be postmarked by **November 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 documents and information for the Court to consider your objection:

- (1) the name of the Litigation: *In re Hospital Sisters Health System Data Breach Litigation*, Case No. 2024CH000043, pending in the Chancery Court of Sangamon County, Illinois;
- (2) your full name, address, telephone number;
- (3) documentation that proves that you are a Class Member (such as the Data Incident notice you have received);
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) copies of any documents you wish to submit in support of your position;
- (6) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name, address telephone number, email address, and state bar number;

- (7) if you or your lawyer have objected in any other cases in the past three years, list the names, courts, and civil action numbers for each of those cases;
- (8) if you have been the named plaintiff in any other class action, list the names, courts, and civil action numbers of each of those cases;
- (9) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (10) 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 **November 14, 2025**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendant.

Clerk of the Court	Settlement Administrator
Clerk of the Court 200 S. 9th Street, #101 Springfield, IL 62701	HSHS Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendant
Gary M. Klinger Milberg Coleman Bryson Phillips Grossman PLLC 227 W. Monroe Street, Suite 2100 Chicago, IL 60606	Mark A. Olthoff <b>Polsinelli PC</b> 900 W. 48th Place Suite 900 Kansas City, MO 64112

## 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 on **December 4, 2025 @ 11:00am Central Time**, at the Chancery Court of Sangamon County, Illinois, at 200 S. 9th Street, #101, Springfield, IL 62701.

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 Payments to the Class Representatives. 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.HSHSDataSettlement.com](http://www.HSHSDataSettlement.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.HSHSDataSettlement.com](http://www.HSHSDataSettlement.com).

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

- Email: [info@HSHSDataSettlement.com](mailto:info@HSHSDataSettlement.com)
- Call toll free, 24/7: 1- (844) 496-1105
- By mail: HSHS Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Chancery Court of Sangamon County, Illinois, 200 S. 9th Street, #101, Springfield, IL 62701.

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