

Notice of Proposed Class Action Settlement

If Mystic Valley Elder Services, Inc. notified you of a Data Incident that occurred on or around April 5, 2024, you may be eligible for compensation benefits from a class action settlement.

**The Middlesex County Superior Court (MA)
has preliminarily approved a class action settlement that may affect your legal rights.**

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

- A class action settlement has been reached in the case of *In re Mystic Valley Elder Services, Inc.*, Case No. 2481CV02873, pending in the Superior Court for Middlesex County, Commonwealth of Massachusetts.
- The Litigation arises out of a cybersecurity incident involving Mystic Valley Elder Services, Inc.'s ("Mystic Valley" or "Defendant") network on or around April 5, 2024 (the "Data Incident"). On October 22, 2024, Mystic Valley sent Plaintiffs and other Class Members written notice of the Data Incident. Mystic Valley denies wrongdoing and liability in connection with the allegations in the Litigation.
- On October 10, 2025, the Court preliminarily approved this settlement (the "Settlement") and, by agreement of the parties to the Litigation (the "Parties"), certified this Litigation to proceed as a class action for settlement purposes only. A full copy of the Settlement Agreement may be reviewed at the Settlement Website at www.MVESDataSettlement.com. This Notice contains only a summary of the Settlement Agreement.
- If Mystic Valley sent you notice on or around October 22, 2024, informing you that your personal identifiable information was involved in the Data Incident, you are a member of the Settlement Class. Excluded from the Settlement Class are: (i) Defendant and its respective officers and directors, and (ii) the Judge assigned to evaluate the fairness of this Settlement. A full copy of the Complaint may be reviewed at the Settlement Website at www.MVESDataSettlement.com.
- If you are a Settlement Class Member, then you may be entitled to compensation and other benefits under the terms of the Settlement. If you are a Settlement Class Member and you wish to file a claim or object to the Settlement, you must follow the procedures contained in the Settlement Agreement and outlined in this Notice.
- This Notice is to advise you of the status of the Litigation, the terms of the proposed Settlement, and your rights in connection with the Settlement. This is not a Litigation against you.
- Your legal rights related to this Litigation are affected whether you act or don't act. **Read this Notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LITIGATION

ACTION	EXPLANATION	DUE DATE
DO NOTHING	You will be included in the Settlement Class but receive no benefits. You will be bound by the Court's judgment of dismissal and will release claims against Mystic Valley/Released Entities relating to the Data Incident and the Litigation.	No deadline
SUBMIT A CLAIM FORM	Settlement Class Members can choose to submit a Claim Form to receive Settlement benefits. You must submit a Valid Claim to the Settlement Administrator to receive any benefits from this Settlement. For more information about submitting a Claim Form, see question 7.	February 9, 2026

	You will be bound by the Court's judgment of dismissal and will release claims against Mystic Valley and Released Entities relating to the Data Incident.	
OBJECT	If you wish to object to the Settlement, you must timely submit written notice of your objection to the Clerk of the Court, and send a copy of your objection to the attorneys for the Parties. Settlement Class Members who do not timely make their objections in this manner will be deemed to have waived all objections and shall not be heard or have the right to appeal approval of the Settlement. If you file an objection and wish it to be considered, <u>you must also appear</u> at the Final Fairness Hearing, in-person or through counsel, to show cause as to why the proposed Settlement should not be approved as fair, reasonable, and adequate.	January 9, 2026

BASIC INFORMATION

1. Why did I receive Notice of this Settlement?

You received Notice of this Settlement because records show that you received a notice from Mystic Valley in or around October 2024 that your personal identifiable information was involved in the Data Incident. If these records are correct, you are a Settlement Class Member and you may be entitled to receive Settlement Benefits if you submit a Valid Claim to the Settlement Administrator before the deadline, and if the Court grants final approval of the Settlement. You also have other options as described in this Notice.

2. What is a class action and who is involved?

In a class action Litigation, one or more people called "Plaintiffs" or "Class Representatives" (in this case, William Matiassek, Diane Remick, Donna Pruitt, Karen Picardi, and Diana Cerrone) sued on behalf of other people who have similar claims. The people together are a "Class." The entity they sued (in this case, Mystic Valley) is called the "Defendant." One court resolves the issues for every member of the "Class."

3. Why is this Litigation a class action?

The Parties have agreed, and the Court has preliminarily decided that this Litigation can proceed as a class action (for settlement purposes only) because it meets the requirements of applicable court rules. Specifically, the Court found that, for settlement purposes only, there are a sufficient number of people who may have been affected by the Data Incident at issue in this case, there are legal questions common to each of them, any claims or defenses of the representative parties are typical to those of the class, the Class Representatives will fairly and adequately represent the Settlement Class's interests, and this class action will be more efficient than having many individual Litigations.

4. What is this Litigation about?

Plaintiffs filed a class action lawsuit against Mystic Valley, individually, and on behalf of anyone whose personal information was potentially compromised as a result of the Breach. The lawsuit arises out of alleged unauthorized access of certain files of Mystic Valley that contained personal information (the "Litigation"). The Litigation is only against Mystic Valley and not the third parties who accessed the information.

Mystic Valley denies wrongdoing and liability in connection with the Litigation. The Court has not made any ruling on the merits of this case. To resolve this matter without the expense, delay, and uncertainties of continued litigation, the Parties have reached a Settlement, which resolves all claims against Mystic Valley and the Released Entities. The Settlement is not in any way an admission of wrongdoing or liability by Mystic Valley and does not imply that there has been, or would be, any finding that Mystic Valley violated the law. The Court has already preliminarily approved

the Settlement. Nevertheless, because the settlement of a class action determines the rights of all members of the class, the Court overseeing this Litigation must give final approval to the Settlement before it can be effective. The Court has certified the Settlement Class for settlement purposes only and subject to final approval of the Settlement, so that members of the Settlement Class can be given this Notice and the opportunity to submit a claim or object to the Settlement. If the Court does not grant final approval of the Settlement, or if it is terminated by the Parties, the Settlement will be terminated, and the Litigation will proceed as if there had been no settlement and no certification of the Settlement Class.

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

You are included in the Settlement if your personal information was involved in the Data Incident. If you are not sure whether you are included or have any other questions about the Settlement, visit www.MVESDataSettlement.com, call toll free 1-800-251-7450, or write to Mystic Valley Data Incident Settlement; c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164.

6. What does the Settlement Provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

Cash Payment

- 1) **Cash Payment:** Settlement Class Members are eligible to receive a *pro rata* cash payment estimated at \$75 per person. This benefit does not require you to submit accompanying documentation other than your own information on the Claim Form.

Expense Reimbursement

- 2) **Out-of-Pocket Losses:** Settlement Class Members are eligible for reimbursement for documented, unreimbursed out-of-pocket expenses that must be fairly traceable to the Data Incident, not to exceed an aggregate total of \$5,000 per Settlement Class Member, including but not limited to: (i) bank fees; (ii) long-distance telephone charges; (iii) cell phone charges (if charged by the minute); (iv) data charges (if charged by the amount of data used); (v) postage; (vi) gasoline for local travel; (vii) fees for credit reports, credit monitoring, or other identity theft insurance product purchased between the date of the Data Incident (April 5, 2024) and the date of the close of the Claims Deadline; and (viii) losses resulting from fraud, identity theft, or similar victimization.

Credit Monitoring and Identity Theft Protection

- 3) **Credit Monitoring Services and Identity Theft Protection:** You have the opportunity to receive two (2) years of Credit Monitoring and Identity Theft Protection services at no cost to you upon submission of a timely, Valid Claim.

The amount of any monetary payment may be increased or decreased on a *pro rata* basis depending on the total amount of Approved Claims. More details can be found in the Settlement Agreement. Pursuant to the terms of the Settlement Agreement, the Settlement Administrator will calculate the final amount that is due to each eligible Settlement Class Member and shall pay each eligible Settlement Class Member who timely returns a completed Valid Claim Form and who otherwise qualifies for payment pursuant to the terms of the Settlement Agreement.

Fees, Costs, and Expenses Associated with the Settlement: As outlined in the Settlement Agreement, Plaintiffs and their attorneys agree to seek attorneys' fees in an amount not more than one-third of the Settlement Fund (*i.e.*, \$173,333.33) and litigation expense reimbursement in an amount not more than \$30,000, provided for in the Settlement Agreement, plus reasonable costs and expenses. Plaintiffs are also requesting service awards of \$2,500 to the Class Representatives. Mystic Valley agrees not to contest requests at or under these amounts.

7. How do I receive a benefit?

If you are an eligible Settlement Class Member and if you wish to receive compensation from the Settlement, then you must make a Valid Claim by February 9, 2026, consistent with the Settlement Agreement.

Claims can be filed online at www.MVESDataSettlement.com by February 9, 2026 or by mailing your Claim Form to the Settlement Administrator at Mystic Valley Data Incident Settlement; c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164. You may also contact the Settlement Administrator toll-free at 1-800-251-7450, or via email at MVESDataSettlement@atticusadmin.com, with any questions. Claims for distribution submitted after February 9, 2026 will not be paid.

8. How will I receive payments?

The Settlement Administrator will issue a payment to each Class Member entitled to compensation under the Settlement Agreement either within thirty (30) days of the Effective Date or within thirty (30) days of the date that the last claim is approved, whichever is later. If there is an appeal of the Settlement, payment may be delayed. Cashing the Settlement check is a condition precedent to any Settlement Class Member's right to receive monetary Settlement Benefits. All Settlement payments shall be void ninety (90) days after issuance.

The Parties cannot predict exactly when (or whether) the Court will give final approval to the Settlement, so please be patient. Updated information about the case can be obtained through Class Counsel at the telephone number or email address provided below.

YOUR RIGHTS AND OPTIONS

9. What happens if I do nothing at all?

If you do nothing, you will not get any benefit from the Settlement, you will not be able to sue Mystic Valley and the Released Entities for claims in this case, and you release the claims against Mystic Valley and Released Entities, as outlined in the Settlement Agreement.

10. How do I object to the Settlement?

You have the right to object to the Settlement if you wish. To object, you must file a written statement with the Clerk of the Court, containing the case name and docket number *In re Mystic Valley Elder Services, Inc.*, Case No. 2481CV02873, no later than January 9, 2026, and simultaneously send copies to Settlement Class Counsel and Defendant's Counsel at the addresses below. You must mail a copy of your objection to the following three places postmarked no later than January 9, 2026:

COURT	SETTLEMENT CLASS COUNSEL	DEFENDANT'S COUNSEL
Clerk of Court Middlesex County Superior Court 200 Trade Center Woburn, MA 01801	Jessica Peake MAZOW MCCULLOUGH 10 Derby Square Salem, MA 01970 A. Brooke Murphy MURPHY LAW FIRM 4116 Will Rogers Pkwy, Suite 700 Oklahoma City, OK 73108 Leigh S. Montgomery EKSM, LLP 4200 Montrose Blvd., Ste. 200 Houston, Texas 77006 Kevin Laukaitis LAUKAITIS LAW LLC 954 Avenida Ponce De Leon Suite 205, #10518 San Juan, PR 00907	Starr T. Drum Xeris E. Gregory POLSINELLI P.C. 2000 South Bridge Parkway Suite 301 Birmingham, AL 35209

Your objection must include: (i) your full name, address, telephone number, and e-mail address (if any); (ii) the case name and docket number; (iii) a written statement of all grounds for the objection, accompanied by any legal support for the objection that you believe applicable and any supporting documents; (iv) the identity of any and all counsel representing you in connection with the objection; (v) a statement as to whether you and/or your counsel will appear at the Final Fairness Hearing; (vi) your signature (an attorney's signature is not sufficient); and (vii) a list, by case name, court, and docket number, of all other cases in which you and/or your counsel has filed an objection to any proposed class action settlement within the last three (3) years.

You will not be excluded from the Settlement by filing an objection.

Any attorney you may hire for the purpose of making an objection must file his or her entry of appearance on or before January 9, 2026. The entry of appearance shall be filed with the Clerk of the Court with a copy served upon Settlement Class Counsel and Defendant's Counsel.

Any Settlement Class Member who does not timely file and serve this written objection will not be permitted to raise an objection, except for good cause shown, and any Settlement Class Member who fails to object in the manner described above will be deemed to have waived objections to the claim and will be foreclosed from raising any objections.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

For purposes of this Settlement, the Class Representatives and the Settlement Class are represented by Settlement Class Counsel. Settlement Class Counsel is comprised of Jessica Peake of Mazow McCullough, Leigh Montgomery of EKSM, Kevin Laukaitis of Laukaitis Law, and A. Brooke Murphy of Murphy Law Firm.

You will not be personally charged for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. Is there a release or waiver of claims?

Yes. You will agree to the “Release” of claims as described in Section 8 of the Settlement Agreement. That means that you cannot sue, continue to sue, or be part of any other Litigation against Mystic Valley or other Released Entities for any of the Released Claims. It also means that the Court’s orders will apply to you and legally bind you. You may view the Settlement Agreement for the full language of the claims you will give up if you remain in the Settlement by requesting a copy from the Settlement Administrator or viewing it online at www.MVESDataSettlement.com.

THE COURT’S FINAL FAIRNESS HEARING

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

The Court has already granted preliminary approval of the Settlement. The Court will hold a Final Fairness Hearing on February 17, 2026 at 2:00 pm in Courtroom 620 at the Middlesex County Superior Court, 200 Trade Center, Woburn, MA 01801. The Final Fairness Hearing may be continued to a future date without further notice. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider and rule on them. The Court may also decide the amount of attorneys’ fees, costs, and expenses to pay Settlement Class Counsel. After the hearing, the Court will decide whether to approve the Settlement.

If the Court does not approve the Settlement, or if it approves the Settlement and the approval is reversed on appeal, or if the Settlement does not become final for some other reason, Settlement Class Members will receive no benefits from the Settlement. Plaintiffs, Mystic Valley, and all of the Settlement Class Members will be in the same position as they were prior to the execution of the Settlement, and the Settlement will have no legal effect, no class will remain certified (subject to approval or otherwise), and the Plaintiffs and Mystic Valley will continue to litigate the case. There can be no assurance that, if the Settlement is not approved, the Settlement Class will recover more than is provided in the Settlement, or indeed, anything at all.

14. Do I have to come to the hearing?

No. Settlement Class Counsel will answer questions the Court may have. But you are welcome to come at your own expense. If you send an objection, you may come to Court to talk about it. You may also pay your own lawyer to attend, if you choose.

GETTING MORE INFORMATION

15. Are more details available?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can obtain a copy of the Settlement Agreement at www.MVESDataSettlement.com, request a copy via email to MVESDataSettlement@atticusadmin.com, or call the Settlement Administrator toll-free at 1-800-251-7450.

Please do not contact the Court Clerk, the Judge, Defendant’s Counsel, or Mystic Valley; they are not in a position to give you any advice about the Settlement.