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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CA. NO. 2481CV02873

WILLIAM MATIASEK, DIANE REMICK,
DONNA PRUITT, KAREN PICARDI, AND
DIANA CERRONE, on behalf of themselves
and all others similarly situated,

Plaintiff,

v.

MYSTIC VALLEY ELDER SERVICES,
INC.,

Defendant.

zak ~~PROPOSED~~ ORDER PRELIMINARILY APPROVING THE PROPOSED CLASS
ACTION SETTLEMENT, SCHEDULING HEARING FOR FINAL APPROVAL
THEREOF AND APPROVING THE PROPOSED FORM AND PLAN OF CLASS
NOTICE

Plaintiffs William Matiassek, Diane Remick, Donna Pruitt, Karen Picardi, and Diana Cerrone ("Plaintiffs") on behalf of the Settlement Class, having applied for an order preliminarily approving the proposed settlement ("Settlement") of this action against Mystic Valley Elder Services, Inc. ("MVES" or "Defendant") following the execution of the Class Action Settlement Agreement and Release (the "Settlement Agreement") between Plaintiffs and MVES; the Court having read and considered the memorandum of law in support of this Motion, the Settlement

Agreement, accompanying documents, and the record herein; and Plaintiffs and MVES (collectively "Parties") having consented to the entry of this Order

NOW, THEREFORE, on this 10th day of October, 2025, upon application of the Parties,

IT IS HEREBY ORDERED that:

1. Unless ordered otherwise, the Court adopts and incorporates the definitions found in the Settlement Agreement.

2. The Court has determined that it holds subject matter jurisdiction to approve preliminarily the Settlement Agreement, which includes the accompanying exhibits and the settlement, and additionally asserts personal jurisdiction over the Plaintiffs, MVES, and all Settlement Class Members.

3. The Court affirms that the relevant requirements outlined in Rules 23(a) and (b) of the Massachusetts Rules of Civil Procedure have been met, indicating probable approval of the settlement and certification of the Settlement Class for judgment purposes.

4. Solely for purposes of this Settlement, the Court conditionally certifies the following Settlement Class in accordance with Massachusetts Rules of Civil Procedure 23(a) and (b):

All living persons whose Personal Information was compromised as a result of the Data Incident, including those who were sent an Incident notification letter.

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.

5. Subject to final approval of the settlement and only for settlement purposes, the Court finds and concludes that the prerequisites to a class action, outlined in Massachusetts Rules of Civil Procedure 23(a) and (b), are satisfied in that:

- a. The Settlement Class is so numerous that joinder of all members is impracticable;
- b. There are questions of law or fact common to the Settlement Class;
- c. The claims of Plaintiffs are typical of those of Settlement Class Members;
- d. Plaintiffs and Class Counsel fairly and adequately protect the interests of the Settlement Class;
- e. Common issues predominate over any individual issues affecting Settlement Class Members; and
- f. Settlement of the Action on a class action basis is superior to other available means of resolving this matter.

6. The terms of the Settlement Agreement are hereby preliminarily approved. The Court has determined that the settlement was entered into at arm's length by experienced counsel and falls within the range of reasonableness, fairness, and adequacy, and that notice of the settlement should be given as provided in this Order because the Court will likely be able to approve the settlement under Rule 23(b) of the Massachusetts Rules of Civil Procedure.

7. The Court appoints William Matiassek, Diane Remick, Donna Pruitt, Karen Picardi, and Diana Cerrone to serve as class representatives for settlement purposes only on behalf of the Settlement Class. This Court finds that they will fairly and adequately protect the interests of the absent Class Members.

8. The Court appoints Jessica Peake of Mazow McCullough, A. Brooke Murphy of Murphy Law Firm, Leigh S. Montgomery of EKSM, and Kevin Laukaitis of Laukaitis Law as Class Counsel, having determined that the requirements of Rule 23 of the Massachusetts Rules of Civil Procedure are fully satisfied by this appointment.

9. The Court appoints Atticus Administration, LLC as Claims Administrator for purposes of this Settlement.

10. A hearing will be held on a date of the Court's convenience on or after February 9, 2026 (approximately 120 days after entry of this Order) to consider the fairness, reasonableness, and adequacy of the Settlement (the "Final Approval Hearing"). The foregoing date, time, and place of the Final Approval Hearing shall be outlined in the Class Notice, which is ordered herein but shall be subject to adjournment or change by the Court without further notice to Settlement Class Members, other than that which may be posted at the Court or on the settlement website.

11. The Court reserves the right to approve the settlement at or after the Final Approval Hearing with such non-substantive modifications as may be consented to by the Parties and without further notice to the Settlement Class.

12. All proceedings in this Litigation as to MVES, other than such proceedings as may be necessary to implement the Settlement or to effectuate the terms of the Settlement Agreement, are hereby stayed and suspended until further order of this Court.

13. All Settlement Class Members and their legally authorized representatives are hereby preliminarily enjoined (i) from filing, commencing, prosecuting, intervening in, or participating as a plaintiff, claimant, or class member in any other lawsuit or administrative, regulatory, arbitration, or other proceedings in any jurisdiction based on the "Released Claims," (used herein as that term is defined in the Settlement Agreement); (ii) from filing, commencing, or prosecuting a lawsuit or administrative, regulatory, arbitration, or other proceeding as a class action on behalf of any Settlement Class Members (including by seeking to amend a pending complaint to include class allegations or seeking class certification in a pending action), based on the

Released Claims; and (iii) from attempting to effect a group, class, or subclass of individuals in any lawsuit or administrative, regulatory, arbitration, or other proceeding based on the Released Claims.

14. No later than thirty (30) days after entry of this Order (“Notice Commencement Date”), the Claims Administrator will commence sending copies of the Short Notice, in the form (without material variation) of Exhibit C, by U.S. mail and/or email (where email addresses are available) to Settlement Class Members as described in the proposed notice plan outlined in the Declaration of Atticus Administration, LLC. The Short Form Notice will provide links to the settlement website where Settlement Class Members can access, among other relevant information, the Claim Form and Long Notice, in the form (without material variation) of Exhibits A and B, respectively.

15. Beginning no later than the Notice Commencement Date, the Claims Administrator shall create and maintain a settlement website, through the end of the Claims Period. The settlement website shall include copies of the Settlement Agreement, this Order, the Long Notice and Short Notice, the Claim Form, the motion for preliminary approval, and all supporting papers; identify important deadlines; and provide answers to frequently asked questions. The settlement website may be amended as appropriate during the administration. The settlement website shall be searchable on the Internet.

16. The Claims Administrator shall maintain IVR toll-free telephone support number for Settlement Class Members to call and receive information about the Settlement. The Settlement Administrator shall also maintain an email address and P.O. Box to receive and respond to correspondence from Settlement Class Members.

17. The Court approves the Notice Plan and the forms of Class Notice as described in the proposed Claim Form, Long Form Notice, and Short Form Notice as Exhibits A, B, and C, respectively. The notice plan and forms of Class Notice (i) are the best notice practicable under the circumstances; (ii) are reasonably calculated, under the circumstances, to apprise Settlement Class Members of the pendency and status of this Litigation and of their right to object to the proposed settlement; (iii) are reasonable and constitute due, adequate, and sufficient notice to all persons entitled to receive notice of the Final Approval Hearing; and (iv) fully satisfy all applicable requirements of Rule 23 of the Massachusetts Rules of Civil Procedure, due process, and any other applicable rules or laws. Non-substantive modifications to the forms of Class Notice may be made without further order of the Court.

18. Settlement Class Members may submit an objection to the proposed Settlement. For an objection to be valid, it must be postmarked by or received by the Settlement Administrator no later than 60 days after the Notice Date and include each and all of the following: (i) the objector's full name, address, telephone number, and e-mail address; (ii) the case name and docket number—*In re Mystic Valley, Inc. Data Incident Litigation*, No. 2481CV02873 (Middlesex Co. (MA) Superior Court); (iii) a written statement of all grounds for the objection, accompanied by any legal support for the objection the objector believes applicable and any supporting documents; (iv) the identity of any and all counsel representing the objector in connection with the objection; (v) a statement whether the objector and/or his or her counsel will appear at the Final Fairness Hearing; (vi) the objector's signature (an attorney's signature is not sufficient); and, (vii) a list of the all cases (including the case name, court, and docket number) in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement within the last three (3) years.

19. Any objection to the Settlement submitted by a Settlement Class Member that complies with paragraph 18 of this Order must be signed by the Settlement Class Member (and if applicable, his, her, or its legally authorized representative), even if the Settlement Class Member is represented by counsel. The right to object to the proposed settlement or to intervene must be exercised individually by the Settlement Class Member and not as a member of a group, class, or subclass, except that such objections and motions to intervene may be submitted by the Settlement Class Member's legally authorized representative.

20. Any Settlement Class Member who fails to comply with the requirements for objecting in writing described in paragraphs 18-19 of this Order: (a) shall be deemed to have waived and forfeited all rights the Settlement Class Member may have to appear separately and/or to object to the Settlement Agreement; (b) shall be forever barred from raising such objection in this or any other action or proceeding related to or arising out of the Settlement; (c) and shall be bound by all the terms of the Settlement Agreement and by all proceedings, orders, and judgments in the Litigation. Any challenge to the Settlement Agreement, the Final Judgment, and Order approving this Settlement Agreement to be entered upon final approval shall be under appeal following the Federal Rules of Appellate Procedure and not through a collateral attack.

21. All Claim Forms shall be submitted by Settlement Class Members to the Claims Administrator as directed in the Class Notice no later than ninety (90) days after the Notice Commencement Date (the "Claims Deadline").

22. To effectuate the Settlement and the notice plan, the Claims Administrator shall be responsible for: (a) providing notification of the proposed settlement to the same population as Defendant's pre-Litigation cybersecurity incident notification in a manner mutually agreeable to the Parties, which may include direct notification through mail and/or e-mail (where available);

(b) creating and hosting a website, publicly accessible through the end of the Claims Period, dedicated to providing information related to this Litigation and access to relevant publicly available court documents relating to this Litigation, the Settlement, and the Settlement Agreement, including the Short Form Notice and Long Form Notice of the settlement, and offering Settlement Class Members the ability to submit claims and supporting documentation for relief; (c) maintaining a toll-free telephone number and P.O. Box by which Settlement Class Members can seek additional information regarding the Settlement Agreement; (d) processing claims and supporting documentation submissions, and the provision of approved payments to Settlement Class Members; and (e) providing any other administrative needs outlined by relevant provisions of the Settlement Agreement.

23. All costs incurred by the Claims Administrator in effectuating the notice plan and administering the settlement shall be covered by MVES, as stated in the Settlement Agreement. Class Counsel shall not, and shall have no authority to, direct the Claim Administrator to take any actions other than as specified in the Settlement Agreement or as ordered by the Court without prior consultation with and approval from MVES.

24. Neither this Order, the Settlement Agreement, nor any of its terms or provisions, nor any of the negotiations or proceedings connected with it, shall be construed as an admission or concession by MVES of the truth of any of the allegations in the Litigation, or of any wrongdoing or liability of any kind. All rights of Plaintiffs and MVES are reserved and retained if the Settlement does not become final following the terms of the Settlement Agreement.

25. Class Counsel shall file their motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Service Awards no later than fourteen (14) days before the Objection Deadline (defined below).

26. Class Counsel shall file their motion for final approval of the settlement no later than fourteen (14) days before the Final Approval Hearing.

27. If the settlement is terminated per its provisions, the Settlement Agreement and all proceedings had in connection therewith, including but not limited to all negotiations, documents, and discussions associated with it, shall be null and void and be of no force and effect, except as expressly provided to the contrary in the Settlement Agreement, and shall be without prejudice to the status quo ante rights of the Parties.

28. If the settlement is terminated or it is not approved, the Court will modify any existing scheduling order to ensure that the Parties will have sufficient time to prepare to resume the litigation.

29. The Court's preliminary certification of the Settlement Class, the appointment of Plaintiffs as class representatives, and findings in this Order shall have no effect on the Court's ruling on any motion to certify any class in the Litigation, or appoint class representatives, and no person may cite or refer to the Court's preliminary approval of the Settlement Class as binding or persuasive authority concerning any motion to certify such class or appoint class representatives.

30. Unless otherwise specified, the word "days," as used herein, means calendar days. If any date or deadline set forth herein falls on a weekend or federal or state legal holiday, such date or deadline shall be deemed moved to the first business day thereafter.

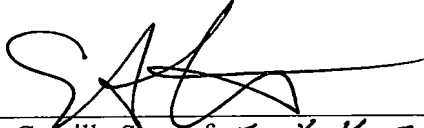
31. The schedule of events referenced above should occur as follows:

Event	Date
Notice Commencement Date	No later than thirty (30) days after entry of this Preliminary Approval Order (the "Notice Commencement Date")
Filing and Service Deadline for Objections	No later than sixty (60) days after the Notice Commencement Date ("Objection Deadline")
Motion for Class Counsel Payment and Service Awards to be filed by Class Counsel	No later than fourteen (14) days before the Objection Deadline

Claims Deadline	No later than sixty (90) days after the Notice Commencement Date
Deadline to file Motion for Final Approval of the Settlement	No later than fourteen (14) days before the Final Approval Hearing
Final Approval Hearing	At least one hundred (120) days after entry of the Preliminary Approval Order

IT IS SO ORDERED.

Dated: 10/10/25

/s/ 
Hon. ~~Camille Sarrouf~~ *Emily Karstetter*
Justice of the Superior Court