

NOTICE OF CLASS ACTION SETTLEMENT

If You Are a Current or Former Employee of La Jolla Group, Inc. and your Personal Information was Impacted by the Cybersecurity Incident in November 2023, You May Be Eligible for Benefits From a Class Action Settlement.

*This is not a solicitation from a lawyer, junk mail, or an advertisement.
A court authorized this Notice.*

This notice summarizes the Settlement reached in a lawsuit entitled *Jaime Dempsey, et al v. La Jolla Group, Inc.*, Case No. 30-2024-01416569-CU-MC-CXC, pending in the Superior Court of California, County of Orange (the “Action”). For the precise terms of the Settlement, please see the Settlement Agreement available at www.LJGDataSettlement.com or by contacting the Settlement Administrator at 1-866-853-4275.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE
TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

**This Notice explains the nature of the lawsuit and claims being settled, your legal rights,
and the benefits to the Settlement Class.**

**Your legal rights are affected whether you act or not act. Read this Notice carefully.
You will be deemed to have carefully read and understood it.**

- A Settlement has been reached in a class action lawsuit filed against La Jolla Group, Inc. (“La Jolla Group” or “Defendant”), for allegedly failing to properly secure and safeguard current and former employees’ personal information, which was allegedly posted on the Dark Web as a result of a cybersecurity incident in or around November 2023 (“Cybersecurity Incident”).
- Participating Settlement Class Members are eligible to file claims for: (i) Out-of-Pocket Losses of up to \$2,000 per Settlement Class Member including Lost Time of up to \$100 per Settlement Class Member (4 hours x \$25 per hour) with an aggregate cap of \$50,000 for Out-of-Pocket Loss claims by all Settlement Class Members; (ii) 24 months of credit monitoring through a national credit reporting bureaus with at least \$1,000,000.00 in fraud insurance (“Credit Monitoring Services”); or (iii) a cash payment, if they do not submit a claim for Out-of-Pocket Losses, of \$95 for members of the California Subclass and \$45 for all other Settlement Class Members (“Cash Compensation”). To receive any of these benefits, Settlement Class Members must submit a timely and valid Claim Form.
- Your legal rights are affected regardless of whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM	This is the only way you may receive benefits from this Settlement. The deadline to submit a Claim Form is November 23, 2026 .
OPT-OUT FROM THE SETTLEMENT	This is the only option that allows you to ever bring or join another lawsuit raising the same legal claims against La Jolla Group. You will receive no payment or Credit Monitoring Services under this Settlement. The deadline to opt-out from the Settlement is November 23, 2026 . You may submit your opt-out request by mail or through the Settlement Website at www.LJGDataSettlement.com .
OBJECT TO THE SETTLEMENT	You may submit a written Objection to the Settlement Administrator about any aspect of the Settlement you don't like or you don't think is fair, adequate, or reasonable. Written Objections must be received by the Deadline. The deadline to submit a written Objection to the Settlement is November 23, 2026 . You may submit your objection by mail or through the Settlement Website at www.LJGDataSettlement.com . You may also appear at the Final Approval Hearing to object, even if you have not submitted a written Objection.
ATTEND THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing. (If you Opt-Out of the Settlement you cannot object.) The Final Approval Hearing will be held on December 17, 2026, at 2:00 p.m. PT .
DO NOTHING	If you do nothing, you will not receive any Cash Benefit or the free Credit Monitoring Services. You will have no right to sue the La Jolla Group later for the claims released by the Settlement.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice. For complete details, please see the Settlement Agreement, whose terms control, available at **www.LJGDataSettlement.com**.
- The Court in charge of this case still has to decide whether to grant final approval of the Settlement. No Settlement Benefits will be provided unless the Court approves the Settlement and it becomes Final.
- Claim Forms, opt-out requests, and objections may all be submitted online through the Settlement Website at **www.LJGDataSettlement.com**.

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BASIC INFORMATION

1. What is this Notice and why should I read it?

The Court authorized this Notice to inform you about a proposed Settlement with La Jolla Group. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Settlement. You may be eligible to receive a cash payment, cash for out-of-pocket losses, cash for lost time, and/or free credit monitoring services. This Notice explains the lawsuit, the Settlement, and your legal rights.

Jaime Dempsey, Jane Doe on behalf of her minor child, J.D., and Kaitlyn Vargas (together “Plaintiffs” or “Settlement Class Representatives”), individually and on behalf of Participating Settlement Class Members brought a lawsuit against La Jolla Group, Inc., (“La Jolla Group” or “Defendant”), in the case of *Jaime Dempsey, et al v. La Jolla Group, Inc.*, Case No. 30-2024-01416569-CU-MC-CXC, pending in the Superior Court of California, County of Orange (the “Action”). La Jolla Group and Plaintiffs are collectively referred to herein as the “Parties.”

2. What is a class action lawsuit?

A class action is a lawsuit in which one or more plaintiffs sue on behalf of a group of people who have similar claims. In a class action, the court resolves the issues for all class members, except those who opt-out from the class. In this case, the Settlement Class is defined as:

All current and former employees of La Jolla Group who reside in the United States and whose information was impacted by the Cybersecurity Incident.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

3. What is this lawsuit about?

Plaintiffs allege that La Jolla Group failed to properly secure and safeguard Plaintiffs’ and other current and former employees’ personal information, which was allegedly posted on the Dark Web as a result of a cybersecurity incident in or around November 2023.

La Jolla Group expressly denies Plaintiffs’ allegations and believes it possesses strong legal defenses to Plaintiffs’ claims. The Court has not determined whether Plaintiffs or La Jolla Group are correct. More information about the Class Action Complaint filed in the Lawsuit can be found on the Settlement Website at www.LJGDataSettlement.com.

If you wish to review the Court’s docket in this case, please visit: <https://www.occourts.org/online-services/case-access/civil-case-access> and enter the case number “2024-01416569.”

4. Why is there a Settlement?

The Parties intend this Agreement to be a final and complete resolution of all disputes between them in respect to the Action. The Parties each agree that the Settlement and the Agreement were negotiated in good faith and at arm’s-length and reflects a Settlement that was reached voluntarily after consultation with legal counsel of their choice. The Parties recognize the outcome of the Action, and the claims asserted in the Action are uncertain, and that protracted litigation of this Action to final judgment would entail substantial cost, risk, and delay of benefits and relief for Plaintiffs and all Settlement Class Members. The Plaintiffs and Settlement Class Counsel, attorneys for the Class Members, believe the terms of the Settlement are fair, reasonable, adequate, and equitable, and that the Settlement is in the best interests of the Settlement Class Members.

WHO’S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

You are part of the Settlement Class if you are a current or former employee of La Jolla Group who resides in the United States and whose information was impacted by the Cybersecurity Incident. Excluded from the Settlement Class are (i) Defendant,

their officers and directors; (ii) all Settlement Class Members who timely and validly opt-out from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Cybersecurity Incident or who pleads nolo contendere to any such charge.

THE SETTLEMENT BENEFITS

6. What benefits does the Settlement provide?

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

Credit Monitoring Services: Participating Settlement Class Members may claim two (2) years of one-bureau credit monitoring with at least \$1,000,000 in identity theft protection insurance, among other features. To receive this benefit, Settlement Class Members must submit a valid Claim Form. No documentation is required to make a claim. Settlement Class Members may elect Credit Monitoring Services *in addition* to any other Settlement benefit.

Lost Time Reimbursement: Participating Settlement Class Members may claim reimbursement for up to four (4) hours of Lost Time at a rate of \$25.00 per hour (for a maximum total of \$100), for time actually spent monitoring accounts or otherwise dealing with issues related to the Cybersecurity Incident between November 2023 and the Claims Deadline, if at least one (1) full hour was spent dealing with the Cybersecurity Incident.

Claims for Lost Time do not need to be supported by any documentation. To receive this benefit, Settlement Class Members must submit a valid Claim Form and attestation that the Lost Time was spent responding to the Cybersecurity Incident.

Examples of lost time include time spent researching the Cybersecurity Incident or reviewing your accounts for signs of identity theft or fraud.

Out-of-Pocket Losses Reimbursement: Participating Settlement Class Members may claim reimbursement of Out-of-Pocket Losses, not to exceed \$2,000 per Settlement Class Member, for actual, unreimbursed monetary loss incurred as a result of the Cybersecurity Incident, between November 2023 and the Claims Deadline; and supported by reasonable documentation, which may include credit card statements, invoices, telephone records, and receipts.

To receive this benefit, Settlement Class Members must submit a valid Claim Form and third-party documentation—which may include credit card statements, invoices, telephone records, and receipts. Personal certifications, declarations, or affidavits standing alone do not constitute reasonable documentation, but may provide clarification or context for other documentation that is submitted.

Examples of out-of-pocket losses include losses due to identity theft fraud. Out-of-pocket losses also include the costs of any credit monitoring services or identity protection services that you purchased because of the Cybersecurity Incident.

Cash Compensation: Participating Settlement Class Members may submit a claim for Cash Compensation, if they do not submit a claim for Out-of-Pocket Losses (including Lost Time). Such compensation shall be \$95 for members of the California Subclass and \$45 for all other Settlement Class Members. To receive this benefit, Settlement Class Members must submit a valid Claim Form. No documentation is required to make a claim.

Any monetary compensation you may receive for Out-of-Pocket Losses under the settlement is capped at \$2,000 (inclusive of any payment for Lost Time), with an aggregate cap of \$50,000 for Out-of-Pocket Loss claims by all Settlement Class Members.

Credit Monitoring Services may be selected in addition to either Out-of-Pocket Loss reimbursement or Cash Compensation.

HOW TO GET BENEFITS

7. How do I make a Claim?

To qualify for any Settlement Benefits, you must complete and submit a valid Claim Form on or before the deadline of **November 23, 2026**. You may make a claim by filing out and submitting the Claim Form online at www.LJGDataSettlement.com or by USPS mail.

Claim Forms are available to download on the Settlement Website at www.LJGDataSettlement.com. You can also request a paper copy of the Claim Form to be sent to you by contacting the Settlement Administrator by phone at 1-866-853-4275 or email at LJGDataSettlement@noticeadministrator.com.

Claims will be subject to a verification process. If you received a Notice with a unique Class Member ID you must include it on your Claim Form.

8. When will I get my payment?

The Final Approval Hearing is when the Court considers the fairness of the Settlement. It is scheduled for **December 17, 2026, at 2:00 pm PT**. If the Court approves the Settlement, eligible Class Members whose Claims were approved by the Settlement Administrator will be sent payment after the Effective Date.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes, the Court has appointed Joshua Swigart of Swigart Law Group APC, Ben Travis of Ben Travis Law, APC and Cassandra Miller of Strauss Borrelli PLLC as “Settlement Class Counsel.” Their contact information is below.

Joshua Swigart

SWIGART LAW GROUP APC

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Should I get my own lawyer?

You don't need to hire your own lawyer because Settlement Class Counsel are working on your behalf. These firms are experienced in handling similar cases. You will not be charged for these lawyers. You can retain your own lawyer to appear in Court for you, at your own cost, if you want someone other than Settlement Class Counsel to represent you.

10. How will the lawyers be paid?

Settlement Class Counsel will ask the Court for attorneys' fees, costs, and expenses not to exceed \$225,000.00, which will be paid by Defendant. Settlement Class Counsel will also request Service Award Payments, not to exceed \$3,000 per Settlement Class Representative, to be paid by Defendant. The Court will determine the proper amount of any attorneys' fees, costs, and expenses to award Settlement Class Counsel and the proper amount of any service award to the Settlement Class Representatives. The Court may award less than the amounts requested.

YOUR RIGHTS AND OPTIONS

11. What claims do I give up by participating in this Settlement?

If you do not opt-out from this Settlement, you will not be able to sue La Jolla Group or any of the Released Parties about the Claims in the Settlement and you will be bound by all decisions made by the Court in this case and the terms of the Settlement, including its Release. This is true regardless of whether you submit a Claim Form. Please read the Settlement Agreement at www.LJGDataSettlement.com for full details. However, you may opt-out from this Settlement (see Question 14). If you opt-out from the Settlement, you will not be bound by the Settlement Agreement, including the Released Claims, but you will not be able to make a claim for any benefits under the Settlement.

"Released Claims" means claims that were or reasonably could have been asserted in the Class Action Complaint, or subsequent operative complaint, based on the facts alleged in the Class Action Complaint, arising from the Cybersecurity Incident, regardless of whether such claims arise under federal, state and/or local law, statute, ordinance, regulation, common law, or other source of law.

The Settlement Agreement describes the Released Claims so please read it carefully. The Settlement Agreement is available at www.LJGDataSettlement.com or in the public Court records on file in this lawsuit. For questions regarding the Release and what it means, you can also contact one of the lawyers listed in Question 9 for free, or you can talk to your own lawyer at your own expense.

12. What happens if I do nothing at all?

If you do nothing, you will not receive any benefits under the Settlement. You will remain in the Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments—whether favorable or not—of the Court and the Settlement Agreement, including the Release. Unless you opt-out, you won't be able to file a lawsuit or be part of any other lawsuit against La Jolla Group or the Released Parties for any of the claims or legal issues resolved in this Settlement.

13. What happens if I opt-out from the Settlement?

If you opt-out from the Settlement, you will receive no benefits under the Settlement. However, you will not be in the Settlement Class and will not be legally bound by the Court's orders and judgments—whether favorable or not—related to the Class and La Jolla Group in this Lawsuit or the terms of the Settlement Agreement, including the Release.

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

You can opt-out of the Settlement by submitting a written Request for Exclusion to the Settlement Administrator by mail or through the Settlement Website at www.LJGDataSettlement.com no later than the Opt-Out Deadline. You must submit a document that includes the name of the proceeding, your full name, personal and original signature, and the words "Request for Exclusion" or a comparable statement that you do not wish to participate in the Settlement. If you do not file a timely Request for Exclusion in accordance with the Settlement Agreement, you will lose the opportunity to opt-out from the Settlement and will be bound by the Settlement. You must submit your written Request for Exclusion to the Settlement Administrator by mail postmarked no later than **November 23, 2026**, to the following address:

La Jolla Group Data Settlement
c/o Analytics Consulting LLC
PO Box 2004
Chanhassen, MN 55317-2004

You cannot opt-out by phone or email, but you may submit your request online through the Settlement Website no later than **November 23, 2026**. Each Class Member who wants to opt-out from the Settlement must submit his or her own opt-out request. No group opt-outs shall be permitted.

15. If I don't opt-out, can I sue La Jolla Group for the same thing later?

No. Unless you opt-out, you give up any right to sue La Jolla Group or the Released Parties for the claims being resolved by this Settlement.

16. If I opt-out, can I get anything from this Settlement?

No. If you opt-out, you are not eligible to submit a Claim Form or receive any benefits.

17. How do I object to the Settlement?

If you do not opt-out from the Class, you can object to the Settlement if you do not agree with any part of it. You can also object to Settlement Class Counsel's request for attorneys' fees, costs, and a service award for the Plaintiffs. Even if you object to the Settlement, you remain a member of the Settlement Class and are entitled to file a claim for benefits under the Settlement.

To object, you may submit your written objection to the Settlement Administrator, including any supporting documents, by mail or through the Settlement Website at **www.LJGDataSettlement.com**, no later than **November 23, 2026**. To submit by mail, you may send to the following address:

La Jolla Group Data Settlement
c/o Analytics Consulting LLC
PO Box 2004
Chanhassen, MN 55317-2004

Your written objection must include the case name, *Jaime Dempsey, et al v. La Jolla Group, Inc.*, Case No. 30-2024-01416569-CU-MC-CXC, Superior Court of California, County of Orange. Your written objection must also include (i) your full name, current mailing address, and telephone number; (ii) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection; (iii) a statement as to whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (iv) the identity of any attorneys representing you; (v) a statement regarding whether you (or your attorney) intends to appear at the Final Approval Hearing; (vi) a list of all other matters in which you and/or your attorney has lodged an objection to a class action settlement; and, (vii) your personal and original signature or your attorney's personal and original signature.

You may also appear at the hearing, at your own expense, to object to the settlement without being required to submit a written objection.

18. What's the difference between objecting and opting-out from the Settlement?

Objecting means that you are telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Opting-out from the Class means that you don't want to be part of the Class. If you opt-out, you have no basis to object.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court have the Final Approval Hearing to determine the fairness of the Settlement?

The Court will hold the Final Approval Hearing on **December 17, 2026, at 2:00 pm PT** at 751 West Santa Ana Blvd., Department CX102, Santa Ana, CA 92701. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Settlement Class Counsel for attorneys' fees, costs, and expenses and Service Award payments to the Settlement Class Representatives.

Note: The date, time, and location (e.g., from in person to zoom) of the Final Approval Hearing are subject to change by Court Order. Any changes will be posted on the Settlement Website, **www.LJGDataSettlement.com**, or through the Court's publicly available docket. You should check the Settlement Website to confirm the date and time have not been changed.

20. Do I have to come to the hearing?

No. Settlement Class Counsel will answer any questions the Court may have, but you are welcome to attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was timely mailed and meets all of the requirements described in the Settlement Agreement, the Court will consider it. You may also pay a lawyer to attend on your behalf at your own expense, but you don't have to.

21. May I speak at the Final Approval Hearing?

Yes. If you do not opt-out from the Class, you may ask the Court for permission to speak at the Final Approval Hearing concerning any part of the proposed Settlement.

GETTING MORE INFORMATION

22. Where can I get additional information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available on the Settlement Website at **www.LJGDataSettlement.com**.

YOU MAY CONTACT THE SETTLEMENT ADMINISTRATOR
ONLINE AT **WWW.LJGDATASETTLEMENT.COM**,
BY CALLING TOLL-FREE 1-866-853-4275,
OR WRITING TO:

La Jolla Group Data Settlement
c/o Analytics Consulting LLC
PO Box 2004
Chanhassen, MN 55317-2004

**PLEASE DO NOT CALL THE COURT, THE CLERK OF THE COURT, THE JUDGE,
OR THE LA JOLLA GROUP WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.**