

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

C.P. et al. v. New Liberty Hospital Corporation

Case No. 24CY-CV00681

Pending in the District Court of Clay County, Missouri

If you are a person residing in the United States whose Private Information was potentially exposed to unauthorized third parties as a result of a Data Incident experienced by Liberty Hospital, a class action settlement may affect your rights.

The District Court of Clay County, Missouri has authorized this notice.

This is not a solicitation from a lawyer.

You are not being sued.

- A Settlement has been reached with New Liberty Hospital Corporation, d/b/a Liberty Hospital (“Liberty Hospital” or “Defendant”), in a class action lawsuit concerning the data security incident that occurred on or about December 19, 2023, in which an unauthorized threat actor accessed Defendant’s computer network and is alleged to have gained access to potentially sensitive information of the Plaintiffs and members of the Settlement Class (the “Data Incident”).
- Liberty Hospital denies all claims of wrongdoing or liability that Plaintiffs, Settlement Class Members, or anyone else has asserted in this Action or may assert in the future based on the conduct alleged in the Action. Despite Defendant’s position that it is not liable for, and has good defenses to the claims alleged in the Action, Defendant has entered into this Settlement to resolve all controversies and disputes arising out of or relating to the allegations made in the Complaint, and to avoid the litigation costs and expenses, distractions, burden, and disruption to its business operations associated with further litigation.
- The Plaintiffs and Settlement Class Counsel believe that the terms set forth in this Settlement provide substantial benefits to the Settlement Class and have determined that they are fair, reasonable, adequate, and in the best interests of the Settlement Class.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

Questions? Call 1-833-262-4164 Toll-Free or Visit
www.LibertyHospitalDataIncidentSettlement.com

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.LibertyHospitalDataIncidentSettlement.com .	January 12, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefits. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own legal counsel at your own expense.	January 12, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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.	January 12, 2026
DO NOTHING	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.

WHAT THIS NOTICE CONTAINS

Click on a link below to jump to that Section:

- [Basic Information](#)
- [Who is in the Settlement](#)
- [The Settlement Benefits](#)
- [Submitting a Claim Form for Settlement Benefits](#)
- [The Lawyers Representing You](#)
- [Excluding Yourself from the Settlement](#)
- [Commenting on or Objecting to the Settlement](#)
- [The Court's Final Approval Hearing](#)
- [If I Do Nothing](#)
- [Getting More Information](#)

Basic Information

1. Why was this Notice issued?

The District Court of Clay County, Missouri authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit, and about all 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 captioned: *C.P. et al. v. New Liberty Hospital Corporation*, Case No. 24CY-CV00681. The individuals that filed this lawsuit, Dan Cook and C.P., are called the “Plaintiffs” or “Class Representatives” and the entity they sued, New Liberty Hospital Corporation (“Liberty Hospital”), is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit concerns the data security incident that occurred on or about December 19, 2023, in which an unauthorized threat actor accessed Defendant’s computer network and is alleged to have gained access to potentially sensitive information of the Plaintiffs and members of the Settlement Class. Specifically, the Private Information allegedly affected by the Data Incident includes names, addresses, dates of birth, medical records, medical treatment information, diagnoses, Social Security numbers, telephone numbers, health insurance information, and email addresses.

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 known as “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 of the settlement.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. Plaintiffs and the Defendant have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

You are included in the Settlement Class if you are an individual residing in the United States whose Private Information was potentially exposed to unauthorized third parties as a result of the Data Incident experienced by Defendant on December 19, 2023.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) the Judge and Magistrate Judge presiding over the Litigation, any members of the Judges' respective staffs, and immediate members of the Judges' respective families; (2) officers, directors, members and shareholders of Defendant; (3) persons who timely and validly request exclusion from and/or opt-out of the Settlement Class and the successors and assigns of any such excluded persons; and (4) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity or occurrence of the data incident or who pleads nolo contendere to any such charge.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator by mail, email, or by calling toll-free.

Liberty Hospital Data Incident Settlement
c/o Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
info@LibertyHospitalDataIncidentSettlement.com
1-833-262-4164

You may also view the Settlement Agreement at www.LibertyHospitalDataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

The Settlement provides for the creation of a \$1,500,000 Settlement Fund that will be used to pay Settlement Awards to Settlement Class Members who submit timely and valid Claim Forms, Service Awards, the Attorneys' Fees and Expenses Award, and Settlement Administration fees. Further, the Settlement provides for additional classwide benefits valued at over \$1,000,000 in the form of cybersecurity enhancements to Defendant's information systems to protect Plaintiffs' and Class Members' private information.

The following Settlement benefits are available to Settlement Class Members:

Documented Expenses and Losses. Settlement Class Members may submit claims for unreimbursed, documented out-of-pocket expenses and financial losses fairly traceable to the Data Incident in an **amount up to \$500.00**. This includes, without limitation, unreimbursed costs, losses, or expenditures relating to fraud or identity theft; professional fees including 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 the Data Incident through the date of claim submission; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

Such claims must be supported by reasonable third-party documentation. “Self-prepared” documents such as handwritten notes or receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation.

Alternative Cash Payments. Settlement Class Members may submit claims for an alternative cash payment, which is estimated to be \$150. The final Cash Payment amount is subject to a *pro rata* increase or decrease depending upon the number of valid claims filed and the amount of funds available for these payments.

For more information about these benefits or to view the Settlement Agreement, please visit www.LibertyHospitalDataSettlement.com.

8. 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 about any of the legal claims this Settlement resolves. The “Release of Claims” section of the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available for review at www.LibertyHospitalDataIncidentSettlement.com.

Submitting a Claim Form for Settlement Benefits

9. How do I submit a claim for a Settlement benefit?

Settlement Class Members can securely submit a Claim Form and upload supporting documentation online at www.LibertyHospitalDataIncidentSettlement.com. Settlement Class Members can also complete and return by mail the Claim Form that accompanied the notice that was mailed to them.

10. What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by **January 12, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be mailed so it is postmarked no later than **January 12, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **January 20, 2026**. 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 benefits will be distributed if the Court grants final approval of the Settlement and after any appeals are resolved, or after the period to seek an appeal has expired.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court appointed the following attorneys as “Class Counsel” to represent you and other Settlement Class Members:

J. Gerard Stranch, IV
STRANCH, JENNINGS & GARVEY, PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203

Maureen Brady
MCSHANE & BRADY
4006 Central Street
Kansas City, MO 64111

13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will Class Counsel be paid?

Class Counsel shall apply to the Court for an Attorneys’ Fees and Expenses Award not to exceed \$600,000. Class Counsel may also seek reimbursement for their reasonable expenses that have not been reimbursed by Plaintiffs, up to \$25,000. Class Counsel’s motion for Attorneys’ Fees will be made available at www.LibertyHospitalDataIncidentSettlement.com once it has been filed with the Court.

Class Counsel will also request that the Court approve Service Award payments for the Class Representatives in an amount not to exceed \$3,500 each, in recognition of the risks and time taken and spent by them as the Class Representatives in commencing and prosecuting this Action.

The Court may award less than these amounts.

Excluding Yourself from the Settlement

15. 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, if any, to separately sue the Defendant about the legal issues in this case, there are steps that you must take to exclude yourself from the Settlement Class. This is called requesting an exclusion from, or “opting out” of the Settlement Class. The deadline to submit a request for exclusion from the Settlement is **January 12, 2026**.

To exclude yourself from the Settlement, you must submit a written request for exclusion that includes the Settlement Class Member’s full name and current address and signature, and (ii)

specifically state their desire to be excluded from the Settlement and from the Settlement Class in the *C.P. et al. v. New Liberty Hospital Corporation*, No. 24CY-CV00681, class action Settlement.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, **postmarked no later than January 12, 2026.**

Liberty Hospital Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 58220
Philadelphia, PA 19102

Failure to comply with these requirements and to timely submit the Request for Exclusion will result in the Settlement Class Member being bound by the terms of the Settlement.

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 Settlement Class Member and do not like a portion or all the Settlement, you can object to it, as long as you have not timely filed a Request for Exclusion. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To be a valid objection, the objection must state: (i) the objector's full name and address; (ii) the case name and docket number – *C.P. et al. v. New Liberty Hospital Corporation*, Case No. 24CY-CV00681 (Mo. Cir. Ct.); (iii) information identifying the objector as a Settlement Class Member, including proof that the objector is a member of the Settlement Class (e.g., copy of the objector's settlement notice, copy of original notice of the Data Incident, or a statement explaining why the objector believes they are a Settlement Class Member); (iv) a written statement of all grounds for the objection, accompanied by any legal support for the objection the objector believes applicable; (v) the identity of any and all counsel representing the objector in connection with the objection; (vi) a statement whether the objector and/or their counsel will appear at the Final Approval Hearing; and (vii) the objector's signature or the signature of the objector's duly authorized attorney or other duly authorized representative (if any) representing him, her, or they in connection with the objection.

To be timely, written notice of an objection (containing the required information listed above) must be mailed with a postmark date no later than **January 12, 2026**, to Class Counsel and Counsel for Defendant:

Class Counsel

J. Gerard Stranch, IV
Stranch, Jennings & Garvey, PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203

Counsel for Defendant

David A. Yudelson
Constangy, Smith & Prophete LLP
2029 Century Park East, Suite 1100
Los Angeles, CA 90067

Maureen Brady
McShane & Brady
4006 Central Street
Kansas City, MO 64111

The objector or their counsel may also file objection with the Court with service on Class Counsel and Defendant's Counsel.

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 hearing on **January 20, 2026 at 9:30 am CT** in the Courtroom of Judge Alexander, in the Circuit Court of Clay County, Missouri, Division 1.

At the final approval hearing, the Court will consider and finally decide whether to enter the Final Approval Order approving the Settlement, and the Court will consider Class Counsel's request for payment of attorneys' fees and costs and Plaintiffs' request for Service Awards. The Court will also consider any objections to the Settlement that were submitted in accordance with the requirements outlined in **Question 17**, above.

If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost (**See Question 17**).

If the date for the Final Approval Hearing is changed, the Settlement Administrator will post the new hearing date on the Settlement Website, www.LibertyHospitalDataIncidentSettlement.com and will provide notice of the new hearing date to Settlement Class Members who submitted timely objections to the Settlement.

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

If I Do Nothing

20. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights described in **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues resolved by this Settlement. In addition, if you do nothing, you will not receive any benefits from this Settlement.

Getting More Information

21. 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.LibertyHospitalDataIncidentSettlement.com.

If you have additional questions, you may contact the Settlement Administrator by mail, email, or by calling toll-free.

Liberty Hospital Data Incident Settlement
c/o Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
info@LibertyHospitalDataIncidentSettlement.com
1-833-262-4164

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, located at 11 S. Water St., Liberty, Missouri 64068.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING QUESTIONS ABOUT THIS SETTLEMENT.