



United States District Court for the Western District of Washington
In re Laboratory Services Cooperative Data Breach Litigation
Case No. 2:25-cv-00685-BJR

Class Action Notice

Authorized by the United States District Court

Were you employed by Laboratory Services Cooperative ("LSC") or did you receive or pay for lab tests ordered by a Planned Parenthood health center on or before October 27, 2024?

There is a \$6,100,000 settlement of a lawsuit related to an alleged data breach that may have exposed information of current and former patients and employees of LSC.

You may be entitled to money and credit monitoring & medical shield services.

To be part of this settlement, you should:

Read this notice.

Respond by November 24, 2026.

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected. ***Please read this Notice carefully and completely.***
- You can learn more at: www.LSCDataSettlement.com

Questions? Call 1-844-933-4334 Toll-Free or Visit www.LSCDataSettlement.com

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About This Notice

What is this notice?

This notice is to tell you about the settlement of a class action lawsuit, *In re Laboratory Services Cooperative Data Breach Litigation*, Case No. 2:25-cv-00685-BJR. A proposed settlement has been reached in the lawsuit involving Laboratory Services Cooperative (the “Defendant” or “LSC”), relating to a data incident which may have exposed the Personal Information of LSC’s current and former patients and employees (the “Data Incident”). **If you were employed by LSC or received or paid for lab tests ordered by a Planned Parenthood health center on or before October 27, 2024, you may be a member of the group of people affected, called the “settlement class.”** This notice gives you a summary of the terms of the proposed settlement, explains what rights settlement class members have, and helps settlement class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a settlement class member. Then, decide if you want to:

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.LSCDataSettlement.com .	November 24, 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 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.	October 26, 2026

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may still 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 submit a claim for Settlement benefits.	October 26, 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 and the Released Parties related to the legal claims resolved by this Settlement.	No Deadline

The Court in charge of this case still has to decide whether to finally approve the Settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **October 26, 2026**

Your deadline to submit a claim form: **November 24, 2026**

Settlement approval hearing: **January 4, 2027, at 10:00 A.M. PT**, via Zoom

Basic Information

What is this lawsuit about?

This lawsuit concerns a Data Incident which may have exposed the Personal Information of LSC's current and former patients and employees. LSC denies all claims alleged against it and denies all charges of wrongdoing or liability. The Settlement is not an admission of wrongdoing or an indication that LSC has violated any laws. Rather, the Plaintiffs and LSC (the "Parties") have agreed to settle the class

action lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

What is a class action?

In a class action, one or more individuals called the Plaintiff(s) or Class Representative(s) sue on behalf of a group or “class” of people with similar claims. In a class action settlement, one court resolves the lawsuit for all class members, except for those who opt out of the settlement.

Why is there a Settlement?

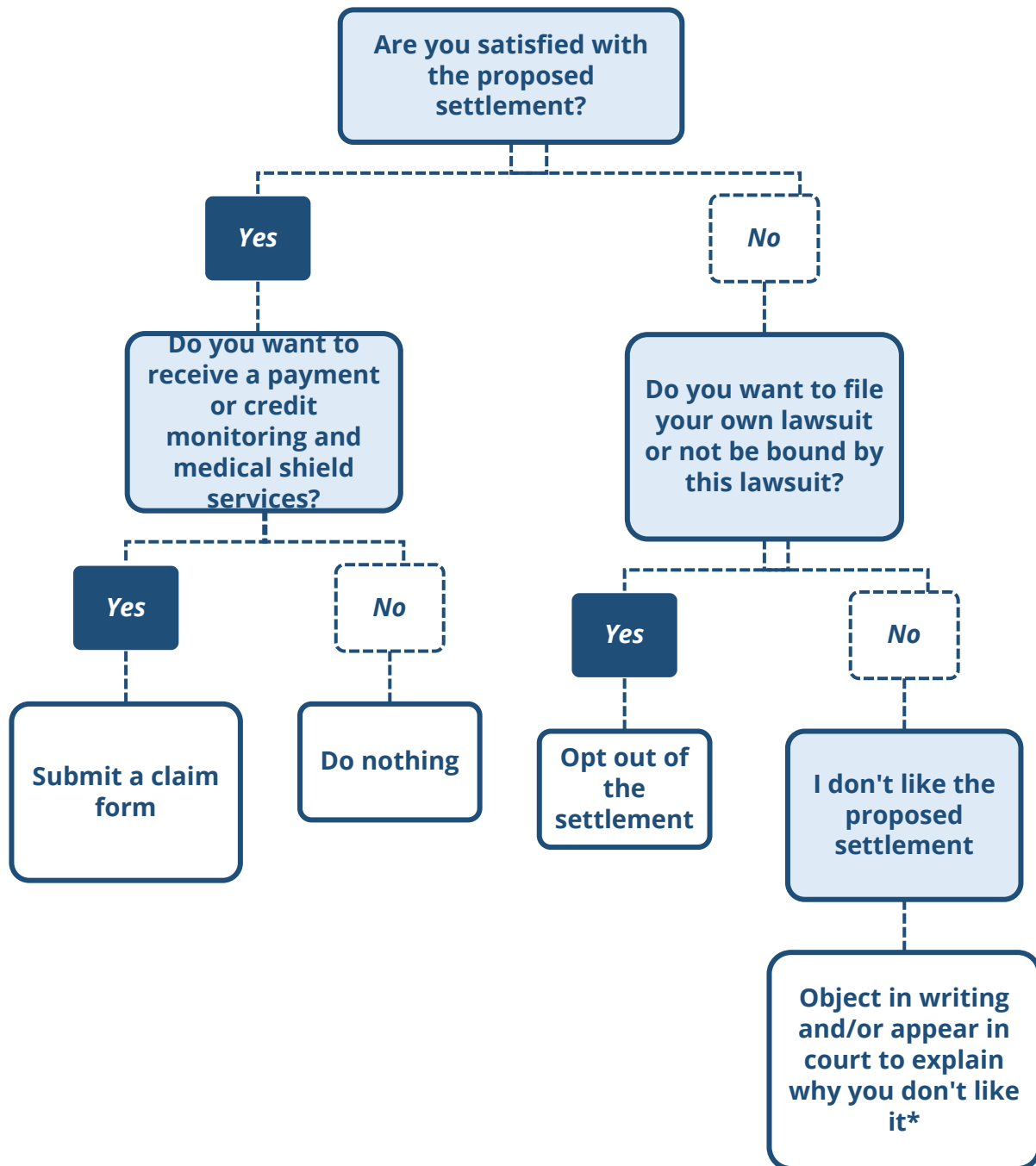
The Court did not decide in favor of the Plaintiffs or the Defendant. The Parties have agreed to the Settlement to avoid the uncertainties and expenses associated with ongoing litigation, and to allow the Settlement Class Members to receive compensation sooner rather than, if at all, after the completion of a trial. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

How do I weigh my options?

You have four options. You can stay in the Settlement and submit a claim, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt Out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

What is the best path for me?



**You can object to the settlement AND submit a claim form to receive payment.*

Who is in the Settlement Class?

Who is included in the Settlement Class?

The Settlement Class is defined as: All U.S. residents whose Personal Information was potentially compromised as a result of the Data Incident which Defendant became aware of on or about October 27, 2024.

Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) the judge presiding over the Litigation and members of his/her direct family, (2) Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or Defendant's parent companies have a controlling interest and their current or former officers and directors, and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

The Settlement Benefits

What does the Settlement provide?

The Settlement provides for the creation of a \$6,100,000.00 Settlement Fund to pay for: (1) Notice and Administrative Expenses, (2) a Fee and Expense Award, as approved and awarded by the Court, (3) Service Awards, as approved and awarded by the Court, (4) documented Out-of-Pocket Losses to Settlement Class Members, (5) pro-rata cash fund payments to Settlement Class Members, and (6) Credit Monitoring and Medical Shield services to Settlement Class Members. The Settlement benefits are summarized below. Visit www.LSCDataSettlement.com for a full description of these benefits.

Settlement Class Members may submit claims for compensation for Out-of-Pocket Losses, a *pro rata* Cash Fund Payment, and two (2) years of Credit Monitoring and Medical Shield services.

Compensation for Unreimbursed Economic Losses. Participating Settlement Class Members can claim up to a total of \$5,000 per person

for out-of-pocket monetary losses reasonably incurred as a result of the Data Incident, including, without limitation, unreimbursed losses relating to fraud or identity theft; professional fees including attorneys' fees, 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, and mileage.

Settlement Class Members submitting claims for Out-of-Pocket Losses must submit documentation supporting their claims. This can include receipts or other documentation that document the costs incurred but does not include documentation that is "self-prepared" by the claimant. "Self-prepared" documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support to other submitted documentation.

Cash Fund Payment. All Settlement Class Members are eligible to make a claim for a *pro rata* cash fund payment of up to \$1,000. The *pro rata* cash fund payments will evenly distribute the net amount of the Settlement Fund, up to \$1,000, to each Settlement Class Member who submits a timely and valid claim. The net amount of the Settlement Fund shall be the amount remaining after payment of all Approved Claims for Out-of-Pocket Losses, Credit Monitoring and Medical Shield services, the Settlement Subclass Payments, Notice and Administration Expenses, any Fee and Expense Award, and Service Awards.

Credit Monitoring and Medical Shield. All Settlement Class Members are eligible to make a claim for two (2) years of Medical Shield Complete by CyEx, which includes comprehensive monitoring for the exposure of Settlement Class Members' medical information, at least one bureau of credit monitoring services, and \$1 million in identity theft protection.

Are there other Settlement Class Member Benefits?

Business Practices Changes: As part of the settlement negotiations, Settlement Class Counsel received assurances that Defendant implemented and will maintain several business practice changes and

security enhancements designed to prevent future data security incidents. Defendant has agreed to provide information regarding the specific changes to Settlement Class Counsel in a confidential declaration prior to the filing of any Preliminary Approval Motion, which shall be available to be filed under seal for the Court's review if it so requests.

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 and certain entities related to Defendant about any of the legal claims this Settlement resolves. The "Releases" 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.LSCDataSettlement.com.

Submitting a Claim Form for Settlement Benefits

How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.LSCDataSettlement.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at: LSC Data Incident Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

You may also contact the Settlement Administrator to request a Claim Form by calling toll-free 1-844-933-4334, by emailing info@LSCDataSettlement.com, or by writing to the address above.

What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by November 24, 2026. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is postmarked no later than November 24, 2026.

When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **January 4, 2027**. 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

Do I have a lawyer in the case?

Yes, the Court appointed Cecily C. Jordan of Tousley Brain Stephens PLLC and Thomas E. Loeser of Crotchett Pitre & McCarthy LLP, to represent you and other Settlement Class Members as Settlement Class Counsel.

Cecily C. Jordan
TOUSLEY BRAIN STEPHENS PLLC
1200 Fifth Avenue, Suite 1700
Seattle, WA 98101

Thomas E. Loeser
CROTCHETT PITRE & MCCARTHY LLP
1809 Seventh Avenue, Suite 1610
Seattle, WA 98101

Should I get my own lawyer?

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

How will Settlement Class Counsel be paid?

Settlement Class Counsel will file a Fee and Expense Application for an

award of attorneys' fees to be paid from the Settlement Fund of up to one third of the Settlement Fund. Settlement Class Counsel will also seek an award for reimbursement of reasonable case costs and expenses actually incurred, in addition to any attorneys' fee award.

Settlement Class Counsel will also request Service Awards for each of the Settlement Class Representatives not to exceed \$2,500 each (or \$5,000 total) in recognition of their contributions to this case. The Court may award less than these amounts.

Settlement Class Counsel's Fee and Expense Application will be available at www.LSCDataSettlement.com after it is filed with the Court.

Excluding Yourself from the Settlement

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 October 26, 2026.

To exclude yourself from the Settlement, you must submit a written request for exclusion that includes the following information:

- (i) the name of the proceeding: *In re Laboratory Services Cooperative Data Breach Litigation*. Case No. 2:25-cv-00685-JBR, pending in the United States District Court for the Western District of Washington;
- (ii) Settlement Class Member's full name;
- (iii) Settlement Class Member's current mailing address;
- (iv) Settlement Class Member's personal signature; and
- (v) the words "Request for Exclusion" or a comparable statement that the individual does not wish to participate in the Settlement, or some other clear manifestation of the intent to opt out of the Settlement.

Your request for exclusion must be mailed to the Settlement

Administrator at the address below, **postmarked no later than October 26, 2026.**

LSC Data Incident Settlement Administrator
ATTN: Exclusion Requests
P.O. Box 58220
Philadelphia, PA 19102

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.

You may only exclude yourself— not any other person. **Any Settlement Class Member who does not file a timely request for exclusion in accordance with this section will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.**

Commenting on or Objecting to the Settlement

How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member and do not like a portion or all of the Settlement, you can object to it, if you choose. You can give reasons why you think the Court should not approve it. The Court will consider your views.

For an objection to be a valid under the Settlement, it must include or substantially comply with the following: (1) the name of the proceeding, (2) the Settlement Class Member's full name, current mailing address, email address, and telephone number, (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection, (4) the identity of any attorneys representing the objector, (5) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing, (6) a statement identifying all class action settlements objected to by the Settlement Class Member in the previous five (5) years, and (7) the signature of the Settlement Class Member. The Court, in its discretion, may authorize additional discovery of objectors.

To be timely, an objection must be mailed to the Settlement Administrator, so it is **postmarked no later than October 26, 2026**.

LSC Data Incident Settlement Administrator
ATTN: Objections
P.O. Box 58220
Philadelphia, PA 19102

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

When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **January 4, 2027, at 10:00 A.M. PT**, via Zoom. Information regarding the Zoom hearing will be available closer to the hearing date at www.LSCDataSettlement.com and on the court's Calendar page at least 24 hours prior to the hearing.

At the final approval hearing, the Court will consider whether to approve the Settlement, Settlement Class Counsel's Fee and Expense Application, and Service Awards to the Settlement Class Representatives. The Court will also consider any objections to the Settlement that were submitted in accordance with the requirements outlined above.

If you are a Settlement Class Member, you or your attorney may ask for permission to speak at the hearing at your own cost.

The date and time of this hearing may change without further notice. Please check www.LSCDataSettlement.com for updates.

Do I have to come to the Final Approval Hearing?

No. Settlement 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

What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties described in Sections II and VIII of the Settlement Agreement 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

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.LSCDataSettlement.com.

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

LSC Data Incident Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
info@LSCDataSettlement.com
1-844-933-4334

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, U.S. District Court Clerk's Office, 700 Stewart Street, Suite 2310, Seattle, WA 98101.

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