

Class Action Settlement

This is not a solicitation from a lawyer. Please read this Notice carefully and completely.

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

Para una notificación en español, llamar al 1-833-417-4931 o visitar nuestro sitio web www.LyonDataIncidentSettlement.com.

- A proposed Settlement arising out of a data security incident has been reached with Lyon Real Estate (“Lyon”). Between April 18, 2023 and May 4, 2023, Lyon experienced a data security incident that affected its computer systems (the “Data Security Incident”). Lyon’s investigation determined that during this Data Security Incident, an unauthorized actor had access to certain files that included names, dates of birth, driver’s license numbers, Social Security numbers, tax identification numbers, medical information, health insurance information, and/or credit card information of certain individuals (collectively, “Personally Identifying Information”). If you were notified by Lyon or a Lyon affiliate that your Personally Identifying Information may have been affected by the Lyon Data Security Incident, you are included in this Settlement as a member of the Settlement Class.
- Under the Settlement, Lyon has agreed to establish a \$637,500 Settlement Fund. The Settlement Fund will pay for five years of identity theft and fraud monitoring, as well as \$1,000,000 in insurance (“Identity Theft and Fraud Monitoring” or “ITFM”) to all Class Members who elect to receive it. Additionally, Class Members are eligible to receive a monetary payment in the form of reimbursement of up to \$10,000.00 per Class Member for Class Members who incurred certain Documented Losses (“Documented Loss Payment”). There is also an additional California statutory cash payment to Class Members who are residents of California (and/or who resided in California on April 18, 2023) (“California Statutory Cash Payment”). After the Settlement Fund has been used to pay (i) Documented Loss Payments; (ii) California Statutory Cash Payments; (iii) ITFM; (iv) the Costs of Notice and Administration; and (v) any award of Attorneys’ fees, reimbursements for litigation expenses, and Service Awards for the representative Plaintiffs, the remaining funds in the Settlement Fund shall be distributed on a *pro rata* basis to each Class Member who submitted a claim for (i) Documented Loss Payment; (ii) California Statutory Cash Payment; and/or (iii) ITFM (“Residual Cash Payment”). In addition, Lyon will implement certain enhanced data security measures.
- Your legal rights will be affected whether you act or do not act. You should read this entire Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

FILE A CLAIM FORM DEADLINE: FEBRUARY 5, 2026	Submitting a Claim Form is the only way that you can receive any of the benefits provided by this Settlement, including a Documented Loss Payment, Identity Theft and Fraud Monitoring, California Statutory Cash Payment, and/or Residual Cash Payment. If you submit a Claim Form, you will give up the right to sue Lyon and certain other Released Parties (as defined in the Settlement Agreement) in a separate lawsuit about the legal claims this Settlement resolves.
EXCLUDE YOURSELF FROM THIS SETTLEMENT DEADLINE: JANUARY 6, 2026	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Lyon or certain other Released Parties, for the claims this Settlement resolves. If you exclude yourself, you will give up the right to receive any Settlement Benefits from this Settlement.
OBJECT TO OR COMMENT ON THE SETTLEMENT DEADLINE FOR WRITTEN OBJECTIONS: JANUARY 6, 2026	You may object to the Settlement by writing to the Settlement Administrator or by attending the Final Approval Hearing. If you object in writing, your writing should explain why you do not think the Settlement should be approved. You will still be bound by the Settlement if it is approved, and you will not be allowed to exclude yourself from the Settlement. If you object, you may also file a Claim Form to receive Settlement Benefits, but you will give up the right to sue Lyon and other Released Parties in a separate lawsuit about the legal claims this Settlement resolves.

This Settlement affects your legal rights even if you do nothing.
Questions? Go to www.LyonDataIncidentSettlement.com or call 1-833-417-4931.

GO TO THE “FINAL APPROVAL” HEARING ON March 13, 2026	You may attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. You are <u>not</u> required to attend the Final Approval Hearing. If you desire to appear remotely at the final approval hearing, you can join via the Department’s Zoom link or phone number. To join by Zoom link: https://saccourt-cagov.zoomgov.com/my/sscdept22 ; To join by phone: (833) 568-8864 / ID: 16184738886.
DO NOTHING	If you do nothing, you will not receive any of the monetary Settlement Benefits and you will give up your rights to sue Lyon and other Released Parties for the claims this Settlement resolves.

- 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. No Settlement Benefits or payments will be provided unless the Court approves the Settlement, and it becomes final.

BASIC INFORMATION

1. Why did I get this Notice?

A court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The case is known as *Kimberly A. Bohannon v. Lyon Real Estate*, Case No. 23CV009153 (the “Action”), in the Sacramento Superior Court. The people who filed this lawsuit are called the “Plaintiffs” and the company they sued, Lyon Real Estate, is called the “Defendant.” The Plaintiffs and the Defendant agreed to this Settlement.

2. What is this lawsuit about?

Between April 18, 2023 and May 4, 2023, Lyon experienced a data security incident that affected its computer systems (the “Data Security Incident”). Lyon’s investigation determined that during this Data Security Incident, an unauthorized actor had access to certain files that included names, dates of birth, driver’s license numbers, Social Security numbers, tax identification numbers, medical information, health insurance information, and/or credit card information of certain individuals (collectively, “Personally Identifying Information”). After conducting a thorough investigation, Lyon began notifying individuals of the Data Incident on or around September 6, 2023.

The Plaintiffs claim that Lyon failed to adequately protect their Personally Identifying Information and that they were injured as a result. Lyon denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that the law has been violated. By entering into the Settlement, Lyon is not admitting that it did anything wrong.

3. Why is this a class action?

In a class action, one or more people called the “Class Representatives” sue on behalf of all people who have similar claims. Together, all of these people are called a “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those Class Members who exclude themselves from the Class.

The Class Representatives in this case are Kimberly Bohannon and Mark Aussieker.

4. Why is there a Settlement?

The Class Representatives and Lyon do not agree about the claims made in this Action. The Action has not gone to trial, and the Court has not decided in favor of the Class Representatives or Lyon. Instead, the Class Representatives and Lyon have agreed to settle the Action.

WHO IS INCLUDED IN THE SETTLEMENT

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

The Court has decided that everyone who fits the following description is a Class Member:

All 7,287 individuals whose Personally Identifying Information may have been compromised in the Data Security Incident

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or to whom Lyon issued a Notice of Data Security Incident.

If you received Notice of this Settlement by mail, you are a Class Member, and your legal rights are affected by this Settlement. If you did not receive Notice by mail, or if you have any questions as to whether you are a Class Member, you may contact the Settlement Administrator.

6. Are there exceptions to individuals who are included as Class Members in the Settlement?

Yes, the Settlement does not include (1) the Judge(s) presiding over the Action and members of their immediate families and their staff; (2) Lyon and its subsidiaries, parent companies, successors, predecessors, and any entity in which Lyon has a controlling interest; (3) natural persons who properly execute and submit a Request for Exclusion prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Class Member, you may go to the Settlement Website at www.LyonDataIncidentSettlement.com, or call the Settlement Administrator's toll-free number at 1-833-417-4931.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

The Settlement will provide Class Members with the opportunity to select and make a claim for five years of Identity Theft and Fraud Monitoring services and \$1 million in insurance (“ITFM”). Additionally, Class Members can submit a claim to receive a monetary payment:

- (A) Cash payments of up to \$10,000 per Class Member for reimbursement of certain Documented Losses (“Documented Loss Payment”).

Class Members who are residents of California (and/or who resided in California on April 18, 2023) are also entitled to:

- (B) California Statutory Cash Payments in the estimated amount of \$250, may be adjusted on a *pro rata* basis should the total amount of claims exceed the Settlement Fund (“California Statutory Cash Payment”). To qualify for the California Statutory Cash Payment, Class Members will have to provide proof of California residency. A sworn attestation shall satisfy the proof requirement for California residency.

The Settlement also provides that after the Settlement Fund has been used to pay (i) all Administrative Expenses (including Taxes, if any), (ii) the Fee Award and Costs, (iii) the Service Awards; (iv) approved claims for Documented Losses, (v) the costs of providing ITFM; and (vi) approved claims for the California Statutory Cash Payments, the remainder shall be distributed on a pro rata basis to each Class Member who submitted a claim for (i) Documented Loss Payment; (ii) California Statutory Cash Payment; and/or (iii) ITFM (“Residual Cash Payment”).

In addition, Lyon has agreed to implement certain enhanced data security measures.

Please review Question 9 carefully for additional information regarding the order in which Settlement Benefits are paid from the Settlement Fund. This additional information may impact your decision as to which of the three Settlement Benefit options is the best option for you.

A. Identity Theft and Fraud Monitoring.

All Class Members may file a Claim Form to receive Identity Theft and Fraud Monitoring (“ITFM”) whether or not you make a claim for other benefits. ITFM provides a way to protect yourself from unauthorized use of your personal information. If you already have identity theft and fraud monitoring, you may still sign up for this additional protection. The ITFM provided by this Settlement is separate from, and in addition to, the identity theft and fraud monitoring that may have been offered to you by Lyon in response to the Data Security Incident. You are eligible to make a claim for the Identity Theft and Fraud Monitoring being offered through this Settlement even if you did not sign up for the previous services.

ITFM includes five years of (i) three-bureau credit monitoring; (ii) up to \$1 million of fraud and identity theft insurance coverage; and (iii) access to a dedicated fraud/identity theft specialist.

To receive ITFM, you must submit a completed Claim Form including a valid email address. You do not need to provide additional documents for this claim – only the Notice ID and PIN provided on your Notice. If you file a valid claim, you

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will receive an enrollment code – valid for 180 days after the Effective Date of the Settlement -- that can be used to enroll in the service.

B. Documented Loss Payment.

You may elect to submit a Claim Form for reimbursement of Documented Losses. If you spent money and/or time remedying or addressing identity theft and fraud that more likely than not resulted from the Lyon Data Security Incident, or you spent money and/or time to protect yourself from future harm because of the Lyon Data Security Incident, you may make a claim for a Documented Loss Payment for reimbursement of up to \$10,000 in Documented Losses.

Documented Losses consist of unreimbursed losses incurred on or after April 18, 2023, that are fairly attributable to the Lyon Data Security Incident, including for example, long distance telephone charges, cell phone minutes (if charged by the minute), internet usage charges (if either charged by the minute or incurred solely as a result of the Data Security Incident), and/or costs of credit reports purchased during the specific time period. Class Members may also submit a claim for hours of lost time spent dealing with the Lyon Data Security Incident at \$25/hour, up to 10 hours maximum per settlement class member.

Claims for Documented Loss Payments must be supported by Reasonable Documentation. Reasonable Documentation means written documents supporting your claim, such as credit card statements, bank statements, invoices, telephone records, and receipts. To satisfy the documentation requirement for a claim for lost time you must provide a sworn checkbox attestation that time claimed was spent dealing with the aftermath of the Lyon Data Security Incident.

Individual payments for Documented Losses may be reduced or increased depending on the number of Class Members that participate in the Settlement.

To receive a Documented Loss Payment, you must submit a completed Claim Form electing to receive a Documented Loss Payment. If you file a Claim Form for a Documented Loss Payment and it is rejected by the Settlement Administrator, you will receive notice from the Settlement Administrator and have 30 days to cure the deficiencies and resubmit your claim.

C. California Statutory Cash Payment.

Class Members who are residents of California (and/or who resided in California on April 18, 2023) may elect to receive an additional cash payment. This is the “California Statutory Cash Payment.” The amount of the California Statutory Cash Payment will vary depending on the number of valid and Approved Claims that are submitted. To receive a California Statutory Cash Payment, you must submit a completed Claim Form electing to receive a California Statutory Cash Payment to the Settlement Administrator. You do not need to provide additional documents for this claim – only the Unique ID number provided on your Notice.

To qualify for the California Statutory Cash Payment in the estimated amount of \$250 (subject to *pro rata* adjustment), Class Members will have to provide proof of California residency as of April 18, 2023. A sworn attestation shall satisfy the proof requirement for California residency. California Statutory Cash Payment may be reduced or increased *pro rata* (equal share) depending on the number of Class Members that participate in the Settlement and the amount of money that remains in the Settlement Fund after payments of other Settlement Benefits and charges with priority for payment under the Settlement. *See Question 9 below.*

9. How will Settlement Benefits be paid?

Before determining which Settlement Benefit option from the Settlement is best for you (selecting a Documented Loss Payment and/or Identity Theft and Fraud Monitoring), it is important for you to understand how Settlement Payments will be made. Plaintiffs’ counsel will seek attorneys’ fees up to a maximum of 35% of the \$637,500 Settlement Fund (i.e., \$223,125), reasonable costs and expenses incurred by attorneys for the Class (referred to collectively as Fee Award and Costs), Administrative Expenses for costs of the settlement administration, and Service Awards of up to \$5,000 to each of the Class Representatives will be deducted from the Settlement Fund before making payments to Class Members. The Court may award less than these amounts. The remainder of the Settlement Fund will be distributed in the following order:

1. Approved Documented Loss Payments will be paid first.
2. Claims for Identity Theft and Fraud Monitoring. If money remains in the Settlement Fund after paying for the Approved Documented Loss Payments, claims for Identity Theft and Fraud Monitoring will be paid second.

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3. Approved California Statutory Cash Payments. If money remains in the Settlement Fund after paying for the approved Documented Loss Payments and Identity Theft and Fraud Monitoring, approved claims for the California Statutory Cash Payments will be paid third. The amount of the California Statutory Cash Payments may be adjusted on a *pro rata* basis should the total amount of claims exceed the Settlement Fund.
4. Residual Cash Payments. If money remains in the Settlement Fund after paying for the Approved Documented Loss Payments, Identity Theft and Fraud Monitoring, and Approved California Statutory Cash Payments, Residual Cash Payments will be paid fourth. Residual Cash Payments will be distributed on a *pro rata* basis.

10. What is the total value of the Settlement?

Not accounting for the cost of the enhanced security measures, the Settlement provides a \$637,500 Settlement Fund for the benefit of the Class. Any Court-approved Fee Award and Costs, Service Awards to the Class Representatives, Taxes due on any interest earned by the Settlement Fund, if necessary, and any Notice and Settlement Administrative Expenses will be paid out of the Settlement Fund, and the balance (“Net Settlement Fund”) will be used to pay for the above Settlement Benefits.

11. What am I giving up to get a Settlement Benefit or stay in the Class?

Unless you exclude yourself, you are choosing to remain in the Class. If the Settlement is approved and becomes final, all of the Court’s orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against Lyon and the other Released Parties about the legal issues in this Action, resolved by this Settlement, and released by the Class Action Settlement Agreement and Release. The specific rights you are giving up are called Released Claims (see next question).

12. What are the Released Claims?

In exchange for the Settlement, Class Members agree to release: (1) the Defendant; (2) each of its respective parents, subsidiaries, affiliates, sibling entities, administrators, successors, reorganized successors, insurers, and members; and (3) the current and former directors, officers, trustees, shareholders, employees, partners, contractors, agents, lenders, investors, and attorneys of Lyon listed in categories (1) and (2) in this paragraph; and (4) current and former Lyon customers, including the customer entities who used Lyon, including the entities listed in categories (1) and (2), for products or services that were used to process data relating to any of the individuals who may have been affected by the Data Security Incident. However, the Released Parties shall not include PaperCut Software Pty Ltd., Inland Business Systems, and any of their respective parents, subsidiaries, affiliates, or successors.

If the Settlement is approved, the Class Representatives and all Settlement Class Members, on behalf of themselves, their heirs, assigns, executors, administrators, predecessors, and successors, and any other person purporting to claim on their behalf, release and discharge all Released Claims, against each of the Released Parties, and agree to refrain from instituting, directing or maintaining any lawsuit, contested matter, adversary proceeding, or miscellaneous proceeding against each of the Released Parties that is reasonably related to the same facts set forth in the Operative Complaint in this Action. This Settlement releases claims against only the Released Parties. This Settlement does not release, and it is not the intention of the Parties to this Settlement to release, any claims against any unidentified third party.

More information is provided in the Class Action Settlement Agreement and Release, which is available at www.LyonDataIncidentSettlement.com.

HOW TO GET SETTLEMENT BENEFITS—SUBMITTING A CLAIM FORM

13. How do I make a claim for Settlement Benefits?

You must complete and submit a Claim Form by **February 5, 2026**. Claim Forms may be submitted online at www.LyonDataIncidentSettlement.com or printed from the website and mailed to the Settlement Administrator at the address on the form. Claim Forms are also available by calling 1-833-417-4931 or by writing to the Settlement Administrator at Lyon Data Security Incident Litigation, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799. The quickest way to file a claim is online.

If you received a Notice by mail, use your Notice ID and PIN to file your Claim Form. If you lost or do not know your Notice ID and PIN, please email info@LyonDataIncidentSettlement.com to obtain it.

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Questions? Go to www.LyonDataIncidentSettlement.com or call 1-833-417-4931.

You may submit a claim for Identity Theft and Fraud Monitoring **AND** a Documented Loss Payment by submitting a Claim Form on the Settlement Website, or by downloading, printing, and completing a Claim Form and mailing it to the Settlement Administrator.

In addition to those Settlement Benefits, Class Members may also submit a claim for a California Statutory Cash Payment if you are a California and/or resided in California on April 18, 2023, by submitting a Claim Form on the Settlement Website, or by downloading, printing, and completing a Claim Form and mailing it to the Settlement Administrator.

14. How do I make a claim for a Documented Loss Payment for reimbursement?

To file a claim for a Documented Loss Payment of up to \$10,000.00 for reimbursement of Documented Losses, you must submit a valid Claim Form electing to receive a Documented Loss Payment. To submit a claim for a Documented Loss Payment, you may either complete a Claim Form on the Settlement Website or print and mail a completed Claim Form to the Settlement Administrator, postmarked on or before **February 5, 2026**.

The Claim Form requires that you sign the attestation regarding the information you provided and that you include Reasonable Documentation, such as credit card statements, bank statements, invoices, telephone records, and receipts.

If your claim for a Documented Loss Payment is rejected by the Settlement Administrator, you will receive notice from the Settlement Administrator and have 30 days to cure the deficiencies and resubmit your claim.

Instructions for filling out a claim for a Documented Loss Payment are included on the Claim Form. You may access the Claim Form at www.LyonDataIncidentSettlement.com.

The deadline to file a claim for a Documented Loss Payment is **February 5, 2026**. Claims must be filed (or postmarked if mailed) by this deadline.

15. How do I make a claim for Identity Theft and Fraud Monitoring?

To file a claim for Identity Theft and Fraud Monitoring, you must submit a valid Claim Form electing to receive Identity Theft and Fraud Monitoring. To submit a claim for Expanded Identity Theft and Fraud Monitoring, you may either complete a Claim Form on the Settlement Website or print and mail a completed Claim Form to the Settlement Administrator, postmarked on or before **February 5, 2026**.

Instructions for filling out a claim for Identity Theft and Fraud Monitoring are included on the Claim Form. You may access the Claim Form at www.LyonDataIncidentSettlement.com.

The deadline to file a claim for Identity Theft and Fraud Monitoring is **February 5, 2026**. Claims must be filed or postmarked if mailed by this deadline.

16. How do I make a claim for a California Statutory Cash Payment?

To file a claim for a California Statutory Cash Payment, you must submit a valid Claim Form electing to receive the California Statutory Cash Payment. To submit a claim for a California Statutory Cash Payment, you may either complete a Claim Form on the Settlement Website or print and mail a completed Claim Form to the Settlement Administrator, postmarked on or before **February 5, 2026**.

Instructions for filling out a claim for a California Statutory Cash Payment are included on the Claim Form. You may access the Claim Form at www.LyonDataIncidentSettlement.com.

The deadline to file a claim for a California Statutory Cash Payment is **February 5, 2026**. Claims must be filed (or postmarked if mailed) by this deadline.

17. What happens if my contact information changes after I submit a claim?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by emailing info@LyonDataIncidentSettlement.com or by writing to the following address:

Lyon Data Security Incident Litigation
c/o Settlement Administrator

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Questions? Go to www.LyonDataIncidentSettlement.com or call 1-833-417-4931.

18. When and how will I receive the Settlement Benefits I claim from the Settlement?

If you make a valid and Approved Claim for Identity Theft and Fraud Monitoring, the Settlement Administrator will send you information on how to activate your credit monitoring after the Settlement becomes final. If you received a Notice in the mail, keep it in a safe place as you will need the unique Claim Number provided on the Notice to activate your Identity Theft and Fraud Monitoring postcard.

Payment for Approved Claims for a Documented Loss Payment and/or a California Statutory Cash Payment will be provided by the Settlement Administrator after the Settlement is approved and becomes final. You may elect to receive payment for Approved Claims for a Documented Loss Payment and/or a California Statutory Cash Payment via PayPal, Venmo, or other digital payment options instead of a check by selecting your preferred payment method on your Claim Form.

The approval process may take time. Please be patient and check www.LyonDataIncidentSettlement.com for updates.

19. What happens if money remains after all of the Settlement Claims are paid?

None of the money in the \$637,500 Settlement Fund will ever be paid back to Lyon. Any money left in the Settlement Fund after 120 days after the distribution of payments to Class Members will be distributed *pro rata* (equal share) among all Class Members who submitted a claim for Documented Loss Payments, California Statutory Cash Payments, and/or IFTM. After the distribution of all payments described above to the Class Members, the remainder will be used to increase the years for IFTM coverage for Class Members who enrolled in the IFTM described above. The distribution of this remainder shall continue until it is no longer practical to increase the number of years of IFTM, whereupon the remainder, if any, will be distributed to the Electronic Privacy Information Center, or another *cy pres* recipient mutually agreed upon by the Parties and approved by the Court.

THE LAWYERS REPRESENTING YOU

20. Do I have a lawyer in this case?

Yes, the Court has appointed Gregory Haroutunian and Brandon P. Jack of Emery Reddy, PC as Class Counsel to represent you and the Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this Action.

21. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award them attorneys' fees of up to a maximum of 35% of the \$637,500 Settlement Fund, plus the reimbursement of their reasonable costs and expenses (referred to collectively as "Fee Award and Costs"). Class Counsel will share and apportion attorneys' fees in an allocation to be presented to and approved by the Class Representatives and by the Court at the Final Approval Hearing. They will also ask the Court to approve up to \$5,000 Service Awards to each of the Class Representatives for participating in this Action and for their efforts in achieving the Settlement. If awarded, these amounts will be deducted from the Settlement Fund before making payments to Class Members. The Court may award less than these amounts.

Class Counsel's application for attorneys' fees and expenses and Service Awards will be made available on the Settlement Website at www.LyonDataIncidentSettlement.com before the deadline for you to comment or object to the Settlement. You can request a copy of the application by contacting the Settlement Administrator at 1-833-417-4931 or info@LyonDataIncidentSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Class Member and want to keep any right you may have to sue or continue to sue Lyon and/or the other Released Parties on your own based on the claims raised in this Action or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from—or "opting out" of—the Settlement.

22. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must complete and sign a Request for Exclusion. The Request for Exclusion must be in writing and identify the case name *Kimberly A. Bohannon v. Lyon Real Estate*, Case No. 23CV009153; state the name, address, and telephone number and unique identifier of the Class Member(s) seeking exclusion; and must also contain

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a statement to the effect that "I hereby request to be excluded from the proposed Settlement Class in *Kimberly A. Bohannon v. Lyon Real Estate*, Case No. 23CV009153." The Request for Exclusion must be postmarked or received by the Settlement Administrator at the address below no later than **January 6, 2026**:

Lyon Data Security Incident Litigation
Attn: Exclusion Requests
P.O. Box 25226, Santa Ana, CA 92799

You cannot exclude yourself by telephone or by email.

23. If I exclude myself, can I still get Identity Theft and Fraud Monitoring or other Settlement Benefits as part of this class action Settlement?

No. If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You can only get any Settlement Benefits, including Identity Theft and Fraud Monitoring or a cash payment, if you stay in the Settlement and submit a valid Claim Form.

24. If I do not exclude myself, can I sue Lyon for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Lyon and the other Released Parties for the claims that this Settlement resolves. You must exclude yourself from this Action to start or continue with your own lawsuit or be part of any other lawsuit against Lyon or any of the other Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECT TO OR COMMENT ON THE SETTLEMENT

25. How do I tell the Court that I do not like the Settlement?

You can ask the Court to deny approval of the Settlement by filing an objection. You cannot ask the Court to order a different Settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no Settlement Payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing or be made by appearing in person at the Final Approval Hearing and voicing an oral objection. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must (a) state the Class Member's full name, current mailing address, and telephone number; (b) include proof that the Class Member is a member of the Settlement Class (e.g., copy of the Settlement Notice, copy of the original notice of the Data Incident); (c) identify the specific factual and legal grounds for the objection; (d) identify all counsel representing the Class Member, if any; and (e) contain a statement regarding whether the Class Member (or counsel of his or her choosing) intends to appear at the Final Approval Hearing. You may instead attend the Final Approval Hearing and voice your objection in person.

All written objections must be submitted to the Settlement Administrator by mailing them. All written objections must be mailed with a postmark date no later than **January 6, 2026**.

Settlement Administrator
Lyon Data Security Incident Litigation
c/o Settlement Administrator
P.O. Box 25226, Santa Ana, CA 92799

26. What is the difference between objecting and requesting exclusion?

Objecting is telling the Court you do not like something about the Settlement. You can object only if you stay in the Class (that is, do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Class or the Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer affects you.

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IF YOU DO NOTHING

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

The Court will hold a Final Approval Hearing on **March 13, 2026** before the Honorable Lauri A. Damrell, Superior Court of the State of California for the County of Sacramento, 720 9th Street, Sacramento, CA 95814.

The date and time of the Final Approval Hearing is subject to change without further notice to the Settlement Class. Class Members should monitor the Settlement Website or the Court's online docket site (<https://prod-portal-sacramento-ca.journaltech.com/public-portal/>) to confirm whether the date for the Final Approval Hearing has changed. Please note that the hearing may be held via telephone or video conference. All details about the Final Approval Hearing will be posted on the Settlement Website.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement; Class Counsel's application for Fee Award and Costs; and the Service Awards to the Class Representatives. If there are objections, the Court will consider them. The Court will also listen to people who have asked to speak at the hearing.

28. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send a written objection, you do not have to come to Court to talk about it. As long as you mail your written objection on time, the Court will consider it.

If you desire to appear remotely at the final approval hearing, you can join via the Department's Zoom link or phone number. To join by Zoom link: <https://saccourt-cagov.zoomgov.com/my/sscdept22>; To join by phone: (833) 568-8864 / ID: 16184738886.

29. May I speak at the Final Approval Hearing?

Yes. If you wish to attend and speak at the Final Approval Hearing, you may do so. If you plan to have your attorney speak for you at the Final Approval Hearing, your objection must also include your attorney's name, address, and phone number.

IF YOU DO NOTHING

30. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will not receive any Settlement Benefits. You will also give up certain rights, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Lyon or any of the other Released Parties about the legal issues in this Action and released by the Settlement Agreement.

GETTING MORE INFORMATION

31. How do I get more information?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.LyonDataIncidentSettlement.com. If you have questions about the proposed Settlement or anything in this Notice, you may also contact the Settlement Administrator at 1-833-417-4931.

**PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE TO INQUIRE ABOUT THIS
SETTLEMENT OR THE CLAIM PROCESS.**

This Settlement affects your legal rights even if you do nothing.
Questions? Go to www.LyonDataIncidentSettlement.com or call 1-833-417-4931.