

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Your Personal Information Was or May Have Been Accessed or Acquired in the North Oklahoma County Mental Health Center, d/b/a NorthCare (“NorthCare”) Data Incident, 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.

- A proposed Settlement been reached in a class action lawsuit known as *Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a NorthCare*, CJ-2022-279 (“Action”), filed in the District Court of Oklahoma County, Oklahoma.
- The Plaintiffs in the Action allege that on or about May 29, 2021, the unauthorized access to or acquisition of the personal information of the Plaintiffs and Settlement Class Members occurred as a result of unauthorized access to NorthCare’s computer servers (the “Data Incident”). NorthCare denies the allegations and maintains that it has defenses to the Action, and that it was prepared to vigorously defend the lawsuit.
- All Settlement Class Members may elect to receive cash reimbursements and Credit Monitoring, or an Alternative Cash Payment, as set forth below:

Reimbursement for Out-of-Pocket/Financial Losses: Settlement Class Members who incurred documented Out-of-Pocket or Financial Losses fairly traceable to the Data Incident may make a claim for reimbursement up to \$2,000.00 per person, with the submission of supporting documents

Reimbursement for Time Spent: Settlement Class members may also submit a claim for up to 5 hours at \$20.00 per hour (for a total of \$100.00) for attested-to Time Spent remedying identity theft or fraud, including misuse of personal information, credit monitoring, freezing credit reports, or other issues related to the Data Incident.

Credit Monitoring Services: In addition to the cash payments described above, Settlement Class Members may also make a claim for three (3) years of one (1) bureau Credit Monitoring Services.

Alternative Cash Payment: In lieu of filing a claim for reimbursement for Out-of-Pocket/Financial Losses, reimbursement for Time Spent, and/or Credit Monitoring Services, Settlement Class Members may make a claim to receive an Alternative Cash Payment in the amount of \$125.00 per person.

Settlement Class Members are: All living individuals residing in the United States whose PII and PHI was or may have been accessed or acquired in the Data Incident.

Excluded from the Settlement Class are: (i) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (ii) the Judge assigned to evaluate the fairness of this

Settlement; and (iii) 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 Data Incident or who pleads *nolo contendere* to any such charge.

YOUR LEGAL RIGHTS ARE AFFECTED REGARDLESS OF WHETHER YOU DO OR DO NOT ACT. READ THIS NOTICE CAREFULLY.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim Form	You must submit a Valid Claim Form to get a Cash Payment or Credit Monitoring from this Settlement. Claim Forms must be submitted online or mailed and postmarked no later than October 11, 2025.
Do Nothing	If you do nothing, you remain in the Settlement. You also give up your rights to sue NorthCare or any of the other Released Parties, and you will not get any of the Settlement Class Member Benefits (cash compensation or offer of free credit monitoring).
Opt Out of the Settlement	Get out of the Settlement. Get no Cash Payment or Credit Monitoring. Keep your rights. This is the only option that allows you to keep your right to sue individually for the claims being released in the Settlement. You will not get any money from the Settlement if you opt out Your request to opt out must be mailed and postmarked no later than September 12, 2025.
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be filed with the Court and postmarked no later than September 12, 2025.
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details. The Final Fairness Hearing is scheduled for December 15, 2025, at 10:00 a.m. CT (11:00 am ET).

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BASIC INFORMATION

1. How do I know if I am affected by the Action and Settlement?

You are a Settlement Class Member if you are living individual residing in the United States whose PII and PHI was or may have been accessed or acquired in the Data Incident.

The Settlement Class specifically excludes: (i) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (ii) the Judge assigned to evaluate the fairness of this Settlement; and (iii) 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 Data Incident or who pleads *nolo contendere* to any such charge.

This Long Form Notice explains the nature of the Action and claims being settled, your legal rights, and the benefits to the Settlement Class.

2. What is this case about?

This case is known as *Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a NorthCare*, CJ-2022-279 (“Action”), filed in the District Court of Oklahoma County, Oklahoma. The individuals who sued are called the “Plaintiffs” or “Class Representatives” and the company they sued, North Oklahoma County Mental Health Center, d/b/a NorthCare, (“NorthCare”) is known as the “Defendant” in this case.

Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of all others whose personal information accessed or acquired as a result of the Data Incident.

The Plaintiffs alleged that on or about May 29, 2021, the unauthorized access to or acquisition of the personal information of the Plaintiffs and Settlement Class Members occurred as a result of unauthorized access to NorthCare’s computer servers (the “Data Incident”). NorthCare maintains that it has defenses to the Action, and that it was prepared to vigorously defend the lawsuit.

Defendant denies all claims asserted against it in the Action and denies all allegations of wrongdoing and liability.

3. Why is there a Settlement?

The Parties agreed to settle the Action and all claims arising out of or related to the allegations or subject matter of the Amended Class Action Petition for the purpose of avoiding the burden, expense, risk, and uncertainty of continuing to litigate the Action. The Plaintiffs, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and in the best interest of the Settlement Class. The Court did not decide in favor of the Plaintiffs or Defendant but must approve this Settlement. Full details about the proposed Settlement are found in the Settlement Agreement available at NorthCareDataSettlement.com.

4. Why is this a class action?

In a class action, one or more people called “Class Representatives” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class members.”

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

You are included in the Settlement Class if you are a living individual residing in the United States whose PII and PHI was or may have been accessed or acquired in the Data Incident. If you are not

sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit NorthCareDataSettlement.com, call toll free 1(844)656-4128, or write to *Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a NorthCare, c/o NorthCare Settlement Administration*, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

SETTLEMENT BENEFITS

6. What does this Settlement provide?

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

Reimbursement for Out-of-Pocket/Financial Losses: Settlement Class Members who incurred documented Out-of-Pocket or Financial Losses fairly traceable to the Data Incident may make a claim for reimbursement up to \$2,000.00 per person, with the submission of supporting documents

Reimbursement for Time Spent: Settlement Class members may also submit a claim for up to 5 hours at \$20.00 per hour (for a total of \$100.00) for attested-to Time Spent remedying identity theft or fraud, including misuse of personal information, credit monitoring, freezing credit reports, or other issues related to the Data Incident.

Credit Monitoring Services: In addition to the cash payments described above, Settlement Class Members may also make a claim for three (3) years of one (1) bureau Credit Monitoring Services.

Alternative Cash Payment: In lieu of filing a claim for reimbursement for Out-of-Pocket/Financial Losses, reimbursement for Time Spent, and/or Credit Monitoring Services, Settlement Class Members may make a claim to receive an Alternative Cash Payment in the amount of \$125.00 per person.

Claims will be subject to review for completeness and validity by the Claims Administrator.

If a Settlement Class Member does not submit a Valid Claim, the Settlement Class Member will release his or her claims against the Released Parties without receiving a Settlement Class Member Benefit.

7. How do I submit a Claim Form?

You must submit a Claim online at the Settlement Website (NorthCareDataSettlement.com) or send a hard copy of the Claim Form to the Claims Administrator at the following address: 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. All Claim Forms will be reviewed by the Claims Administrator for completeness and validity. Claim Forms must be postmarked or submitted online no later than October 11, 2025. For more information, please visit NorthCareDataSettlement.com, or you can call the Claims Administrator at 1-844-656-4128 for a Claim Form.

8. What am I giving up as part of the Settlement?

If you stay in the Settlement Class, you will be eligible to receive the benefits outlined herein, but you will not be able to separately sue NorthCare, nor any of its past, present, and future, direct or indirect, parent companies, partnerships, corporations, subsidiaries, affiliates, divisions, investors, employees, servants, agents, managers, members, providers, partners, principals, directors, shareholders, and owners, and all of its respective attorneys, heirs, executors, administrators, insurers, coinsurers, reinsurers, joint ventures, personal representatives, predecessors, successors, transferees, trustees, associates, and assigns, and includes, without limitation, any Person related to any such entity (collectively, “Released Parties”), regarding claims relating to the Data Incident.

The Settlement Agreement, which includes all provisions about Released Claims, releases, and Released Parties, is available at NorthCareDataSettlement.com.

The only way to keep the right to sue the Released Parties regarding the Data Incident is to opt out of the Settlement (*see* Question 10). Otherwise, you will be included in the Settlement Class, and if the Settlement is approved, you give up the right to sue for these claims.

9. Will the Class Representatives receive compensation?

Yes. If approved by the Court, the two Class Representatives may each receive a Service Award of up to \$2,000.00, to compensate them for their services and efforts in bringing the Action. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

EXCLUDE YOURSELF

10. How do I opt out of the Settlement?

If you do not want to be included in the Settlement, you must “opt out” by sending a timely request to opt out, stating your full name, address, and telephone number. Your request to opt out must state that you want to be excluded from the Settlement in the Action and include your name, address, and original signature (or the original signature of a person authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf with respect to a claim or right such as those in the Action).

Your written request to opt out must be postmarked no later than **September 12, 2025** to:

*Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a
NorthCare*

c/o NorthCare Settlement Administrator

ATTN: Exclusions

PO Box 58220

Philadelphia, PA 19102

Instructions on how to submit a request to opt out are available at NorthCareDataSettlement.com, or from the Claims Administrator by calling 1-844-656-4128.

If you opt out, you will not be able to receive any of the Settlement Class Member Benefits, and you cannot object to the Settlement at the Final Fairness Hearing. You will not be legally bound

by anything that happens in the Action, and you will keep your right to sue Defendant on your own for the claims that this Settlement resolves.

11. If I do not opt out, can I sue later?

No. If you do not opt out of the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Parties (listed in Question 8) for the claims this Settlement resolves.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any money or reimbursement from the Settlement, you will not be able to start or proceed with a lawsuit against the Released Parties arising from the Data Incident, or be part of any other lawsuit against the Released Parties (listed in Question 8) related to the settled claims in this case at any time

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed William B. Federman of Federman & Sherwood, David K. Lietz of Milberg Coleman Bryson Phillips Grossman, LLC and Mark S. Reich of Levi & Korsinsky, LLP. (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

On or before August 28, 2025, Class Counsel will file an application with the Court for attorneys’ fees, costs, and expenses and Class Representative service awards. Class Counsel will petition the Court for up to \$250,000.00 in attorneys’ fees, costs, and expenses and up to \$2,000.00 in service awards for each of the Class Representatives. A copy of the application will be posted on this Settlement Website, NorthCareDataSettlement.com, after it is filed. The Court will make the final decision as to the amounts to be paid to Class Counsel and may award less than the amount requested by Class Counsel.

OBJECTING TO THE SETTLEMENT

15. If I do not like the Settlement, how do I tell the Court?

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you must file an Objection with the Court and serve it on Class Counsel, NorthCare’s Counsel, and the Claims Administrator by **September 12, 2025** (the last day of the “Objection Period”) stating why you do not think the Settlement should be approved.

To be valid, each Objection must set forth the following:

- a. the objector's full name, address, telephone number (if any), and email address (if any);
- b. information identifying the objector as a Settlement Class Member;
- c. a written statement of all grounds for the objection, accompanied by any legal support the objector cares to submit;
- d. the identity of all lawyers (if any) representing the objector;
- e. the identity of all of the objector's lawyers (if any) who will appear at the Final Fairness Hearing;
- f. a list of all persons who will be called to testify at the Final Fairness Hearing in support of the objection;
- g. a statement confirming whether the objector intends to personally appear and/or testify at the Final Fairness Hearing;
- h. the objector's signature or the signature of the objector's duly authorized lawyer or other duly authorized representative;
- i. a list, by case name, court, and docket number, of all other cases in which the objector (directly or through a lawyer) has filed an objection to any proposed class action settlement within the last three (3) years; and
- j. a list, by case number, court, and docket number, of all other cases in which the objector has been a named plaintiff in any class action or served as a lead plaintiff or class representative.

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel.

Your objection must be filed with the Clerk of Court by **September 12, 2025** (the last day of the "Objection Period") and must also include the case name and docket number *Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a NorthCare*, Case No. CJ-2022-279 ("Action"). It will be filed in District Court of Oklahoma County, Oklahoma. The address of the Clerk of Court is as follows:

Clerk of Court,
District Court of Oklahoma County, Oklahoma
321 Park Ave.
Oklahoma City, OK 73102

In addition, you must concurrently mail, or hand deliver a copy of your objection to Class Counsel, NorthCare's Counsel and the Claims Administrator, mailed and postmarked no later than **September 12, 2025**:

CLASS COUNSEL	NORTHCARE'S COUNSEL
William B. Federman FEDERMAN & SHERWOOD 10205 N. Pennsylvania Avenue Oklahoma City, OK 73120	Timila S. Rother, Alison M. Howard, and Anthony J. Hendricks of Crowe & Dunlevy 324 North Robinson, Suite 100, Oklahoma City, OK 73102
CLAIMS ADMINISTRATOR	

*Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a
NorthCare c/o NorthCare Settlement Administrator*
PO Box 58220
Philadelphia, PA 19102

If you do not submit your objection with all requirements, or if your objection is not timely submitted by **September 12, 2025**, you will be considered to have waived all objections and will not be entitled to speak at the Final Fairness Hearing.

16. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Opting out is telling the Court that you don't want to be part of the Settlement Class. If you opt out, you have no basis to object because the Settlement no longer affects you.

THE FINAL FAIRNESS HEARING

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

The Court will hold the Final Fairness Hearing on **December 15, 2025 10:00AM** CST in Courtroom 712, of the District Court of Oklahoma County, Oklahoma 321 Park Ave., Oklahoma City, OK 73102. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check the website for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of the Settlement Class Members, and if it should be Finally approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the attorneys' fees and costs requested to be paid to Class Counsel, as well as the request for a Service Award to the Class Representatives.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Fairness Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer

to attend the Final Fairness Hearing, but that is not necessary. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

19. May I speak at the hearing?

Yes. You can speak at the Final Fairness Hearing, but you must ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required for you to

GET MORE INFORMATION

20. How do I get more information about the Settlement?

This is only a summary of the proposed Settlement. If you want additional information about this Action, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards for Class Representatives when available, and more, please visit the Settlement Website, www.NorthCareDataSettlement.com or call 1-844-656-4128. You may also contact the Claims Administrator at *Ana Chavez Maendele, et al. v. North Oklahoma County Mental Health Center, d/b/a NorthCare*, c/o NorthCare Settlement Administrator 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR ACTION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR
NORTHCARE'S COUNSEL.**