

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*In Re: Maxar Data Security Litigation*

Case No. 24CV452108

Superior Court of the State of California, Santa Clara County

**IF YOU WERE IMPACTED BY THE OCTOBER 2024  
MAXAR SPACE DATA BREACH,  
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,  
AND ENTITLE YOU TO BENEFITS AND CASH PAYMENTS.**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with Maxar Space LLC and Maxar Space Robotics LLC (“Maxar” or “Defendants”) in a class action lawsuit. This class action lawsuit concerned a cyberattack on Maxar’s computer systems that occurred in or around October 2024 (the “Data Incident”). The class action lawsuit alleges that certain files that contained private information were accessed in the Data Incident. These files may have contained personal information such as names; Social Security numbers; home addresses; gender; employment information; and business contact information.
- The lawsuit is called *In Re: Maxar Data Security Litigation*, Case No. 24CV452108, pending in the Superior Court of the State of California, Santa Clara County (the “Litigation”).
- Maxar denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the litigation.
- Maxar's records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Maxar.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

<b>SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM</b>	<p>The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.MaxarSettlement.com">www.MaxarSettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p>	<b>July 16, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	<b>June 16, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	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.	<b>June 16, 2026</b>
<b>DO NOTHING</b>	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 Defendants 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.

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### Basic Information

#### 1. Why was this Notice issued?

The Superior Court of the State of California, Santa Clara County, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of 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 called *In Re: Maxar Data Security Litigation*, Case No. 24CV452108, pending in the Superior Court of the State of California, Santa Clara County. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the companies they sued, Maxar Space LLC and Maxar Space Robotics LLC, are called the “Defendants.”

#### 2. What is this lawsuit about?

This lawsuit alleges that in October 2024 a targeted cyberattack occurred on Maxar's computer systems, and that certain files that contained private information were accessed. These files may have contained personal information such as names; Social Security numbers; home addresses; gender; employment information; and business contact information.

#### 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 called the “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 from the settlement. In this Settlement, the Class Representatives are Cynthia Replogle and Philipp Covington, and everyone included in this Action are the Class Members.

#### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendants are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. Plaintiffs and their attorneys think the Settlement is best for all Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class this way: “All living persons residing in the United States whose PII was potentially compromised in the Data Incident announced by Maxar in or around October of 2024, including all persons who received a breach notice letter.” PII stands for Personally Identifiable Information.

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are:

- (1) the Judge in this case, and the Judge’s family and staff
- (2) the lawyers for the Plaintiffs and Defendants, and their families and staff
- (3) government entities
- (4) Maxar’s officers and directors, and some associated companies
- (5) anyone who validly excludes themselves from the Settlement.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@MaxarSettlement.com](mailto:info@MaxarSettlement.com)
- Call toll free, 24/7: 1-833-386-6496
- By mail: Maxar Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA, 92799.

You may also view the Settlement Agreement at [www.MaxarSettlement.com](http://www.MaxarSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

Maxar has agreed to provide a range of benefits to the Class. These benefits are described below.

You are not limited to one benefit. You may file a claim for each benefit that you qualify for.

#### **BENEFITS**

**Credit Monitoring Services.** You can enroll in three years of credit monitoring from a credit bureau. This benefit comes with \$1,000,000.00 in identity theft protection. An enrollment code will be emailed to you.

**Compensation for Out-of-Pocket Expenses.** You can get back up to \$3,500.00 for out-of-pocket expenses. These expenses have to be because of the Data Incident. You will need to provide proof, like receipts, to show your expenses. You can include your own notes to explain or clarify the receipts, but your notes by themselves are not enough for a valid claim.

This benefit covers things like:

- (1) bank, credit card, and debit card fees;
- (2) postage;
- (3) long-distance or by-the-minute phone charges;
- (4) data charges (if charged by the amount of data used);
- (5) gas money for local travel; and

- (6) fees for credit reports or credit monitoring

These out-of-pocket expenses are covered if they happened after October 11, 2024.

**Compensation for Lost Time.** If you spent time addressing the Data Incident, you can get paid for your time. You can claim up to 4 hours of time, at \$20.00 per hour. The maximum lost time payment is \$80.00.

This payment counts toward the \$3,500.00 cap under Compensation for Out-of-Pocket Expenses, above.

You do not need to submit proof to claim this benefit.

**CCPA Payment (California Residents Only).** If you are a resident of California, you can claim an additional cash payment. This payment is expected to be \$100.00, but may be reduced on a pro rata basis if more than \$15,000 is claimed by eligible class members.

CCPA Payments are separate from Compensation for Out-of-Pocket Expenses, and don't count toward the \$3,500.00 cap.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@MaxarSettlement.com](mailto:info@MaxarSettlement.com)
- Call toll free, 24/7: 1-833-386-6496
- By mail: Maxar Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA, 92799.

## 8. What claims am I releasing if I stay in the Class?

If you stay in the class, you won't be able to be part of any other lawsuit against Maxar about the issues that this Settlement covers. The "Release" section of the Settlement Agreement (Section VI) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.MaxarSettlement.com](http://www.MaxarSettlement.com).

## Submitting a Claim Form for a Settlement Payment

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

The fastest way to submit your Claim Form is online at [www.MaxarSettlement.com](http://www.MaxarSettlement.com). If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at:

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

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-386-6496, by email [info@MaxarSettlement.com](mailto:info@MaxarSettlement.com), or by U.S. mail at the address above.

### 10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **July 16, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **July 16, 2026**.

## 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **September 24, 2026** (see **Question 18**). If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement benefits and payments will be distributed if the Court grants final approval, and after any appeals are resolved.

## The Lawyers Representing You

### 12. Do I have a lawyer in the case?

Yes, the Court appointed attorneys John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC, and A. Brooke Murphy of Murphy Law Firm, to represent you and other Class Members (“Class Counsel”).

### 13. Should I get my own lawyer?

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

### 14. How will Class Counsel be paid?

Class Counsel will ask the court to approve \$125,000.00, which will be paid by Maxar.

Class Counsel will also ask for a Service Award of \$2,000 for each of the Class Representatives. The Service Award will also be paid by Maxar.

## Excluding Yourself from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive a Settlement payment, but you will keep any rights you may have to sue Maxar on your own about the legal issues in this case.

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.

The deadline to exclude yourself from the Settlement is **June 16, 2026**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Litigation: *In Re: Maxar Data Security Litigation*, Case No. 24CV452108, pending in the Superior Court of the State of California, Santa Clara County;
- (2) your full name;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Maxar Data Incident Settlement  
ATTN: Exclusion Request  
P.O. Box 25226, Santa Ana, CA, 92799

Your Request for Exclusion must be submitted, postmarked, or emailed by **June 16, 2026**.

## **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 Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Litigation: *In Re: Maxar Data Security Litigation*, Case No. 24CV452108, pending in the Superior Court of the State of California, Santa Clara County;
- (2) your full name;
- (3) a clear description of all the reasons you object; include any factual and legal support you may have for your objection;
- (4) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (5) a list of any cases from the last 4 years in which you or your lawyer objected; and
- (6) your personal signature.

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **June 16, 2026**. You must also send a copy of your objection to the Settlement Administrator.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of the Court Superior Court of Santa Clara County 191 North First Street San Jose, CA95113	Maxar Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA, 92799

### **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 **September 24, 2026 at 1:30 p.m. Eastern Time**, in Department 22 of the Superior Court of the State of California, Santa Clara County, at 191 North First Street, San Jose, CA 95113.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award Service Award to the Class Representatives who brought this Action on behalf of the Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check [www.MaxarSettlement.com](http://www.MaxarSettlement.com) for updates.

### 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, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### 20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement. You will also give up the rights described in **Question 8**.

## Getting More Information

### 21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.MaxarSettlement.com](http://www.MaxarSettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@MaxarSettlement.com](mailto:info@MaxarSettlement.com)
- Call toll free, 24/7: 1-833-386-6496
- By mail: Maxar Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA, 92799.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 191 North First Street, San Jose, CA 95113.

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**