

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Southern District of Florida
Crowe, et al., v. Managed Care of North America, Inc., et al., Case No. 0:23-cv-61065-AHS

Were you notified that your Private Information was potentially impacted by a Data Incident at MCNA between February 26, 2023 and March 7, 2023? You may be eligible for benefits from a class action settlement.

A Federal court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Managed Care of North America, Inc. (“MCNA”), MCNA Insurance Company (“MCNAIC”), and Healthplex, Inc. (“Healthplex”) (collectively, the “Defendants”) in a class action lawsuit. The lawsuit alleges that between February 26, 2023 and March 7, 2023, there was potential unauthorized access to personally identifiable information and private health information (“Private Information”) on MCNA’s computer systems. The Plaintiffs allege negligence and breach of implied contract, among other claims. The Defendants deny all allegations and any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendants have done anything wrong.
- The Settlement Class consists of all living individuals who were sent a notice of the Data Incident stating their Private Information was potentially impacted as a result of the Data Incident.
- Under the proposed Settlement, the Defendants will pay for Settlement Class Member Benefits, all Settlement Administration Costs, and any Court-awarded attorneys’ fees and costs subject to the terms of the Settlement. Settlement Class Members will *automatically*, without having to submit a Claim Form, receive two years of Medical Data Monitoring. Subject to the limitations contained in the Settlement described herein, the Settlement also provides a total of up to \$250,000 for Cash Payments for Documented Out-of-Pocket Losses (up to \$2,500 per individual Claim) to Settlement Class Members who file a Valid Claim.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive a Cash Payment for Documented Out-of-Pocket Losses from this Settlement is to submit a Claim Form.	October 19, 2026
EXCLUDE YOURSELF FROM THE SETTLEMENT	If you exclude yourself, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendants about the claims resolved by this Settlement. You will not receive any benefits from the Settlement.	October 19, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not exclude yourself from the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for benefits.	October 19, 2026
DO NOTHING	If you do nothing, you will remain in the Settlement Class and give up the right to sue the Defendants about the claims resolved by this Settlement. You will <i>automatically</i> receive two years of Medical Data Monitoring; however, you will not receive a Cash Payment for Documented Out-of-Pocket Losses unless you submit a Claim Form.	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 must decide whether to approve the Settlement.

Questions? Call (833) 930-0161 or visit www.MCNAdatabreachsettlement.com.

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BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all of your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *Crowe, et al., v. Managed Care of North America, Inc., et al.*, Case No. 0:23-cv-61065-AHS pending in the United States District Court for the Southern District of Florida. The people who filed this Action are called the “Plaintiffs” and the companies they sued, Managed Care of North America, Inc. (“MCNA, Inc.”), MCNA Insurance Company (“MCNAIC,” and together with MCNA, Inc., “MCNA”), and Healthplex, Inc. (“Healthplex”) are called the “Defendants.”

2. What is this Action about?

On or about March 7, 2023, the Defendants became aware that an unauthorized party had potentially accessed personally identifiable information and private health information (“Private Information”) of certain individuals from MCNA’s network between February 26, 2023, and March 7, 2023 (the “Data Incident”). The Private Information potentially may have included some combination of the following: names, physical addresses, email addresses, dates of birth, Social Security Numbers, driver’s license numbers, government-issued ID numbers, health insurance information (such as plan information, insurance company name, and member number), Medicaid and Medicare ID numbers, information regarding dental/orthodontic care, and plan and/or group number.

On May 26, 2023, Defendants began sending notice letters to potentially affected persons, informing them that their Private Information may have been compromised in the Data Incident.

The Plaintiffs allege negligence and breach of implied contract, among other claims. The Defendants deny all of the Plaintiffs’ claims and any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendants have done anything wrong.

3. What is a class action?

In a class action, one or more people called “Class Representatives” or “Plaintiffs” sue on behalf of people who may have similar claims. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Settlement, the Class Representatives are Kade McCraw, Sara Hughes, Samantha Hathaway, Tarek Kachakech, Yvon Hanekom, and Frannie Zurline.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendants. The Defendants deny all claims and any wrongdoing whatsoever. The Plaintiffs and Defendants agreed to a Settlement to avoid the costs and risks of a trial, and enable Settlement Class Members to receive benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members as “Class Counsel,” believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all living individuals in the United States who were sent a notice of the Data Incident stating that their Private Information was potentially impacted as a result of the Data Incident.

6. Are there exceptions to being included?

Yes, excluded from the Settlement Class are: (1) all persons who are directors, officers, and agents of the Defendants, or their respective subsidiaries and affiliated companies; (2) governmental entities; (3) the Judge assigned to the Action, that Judge's immediate family, and Court staff; and (4) any Settlement Class Member who timely and properly opts-out of the Settlement.

THE SETTLEMENT CLASS MEMBER BENEFITS

7. What does the Settlement provide?

Under the proposed Settlement, the Defendants will pay for Settlement Class Member Benefits, all Settlement Administration Costs, and any Court-approved attorneys' fees and costs. Settlement Class Member Benefits include:

- **Medical Data Monitoring:** Two years of CyEx's Medical Shield Complete, provided *automatically* to Settlement Class Members who do not opt-out of the Settlement and choose to enroll in the monitoring.
- **Cash Payments for Documented Out-of-Pocket Losses:** A total of up to \$250,000 for Cash Payments for unreimbursed Documented Out-of-Pocket Losses (up to \$2,500 per individual Claim) to Settlement Class Members who file a Valid Claim with supporting documentation. Cash Payments will be reduced *pro rata* in the event the total dollar amount of all Valid Claims exceeds \$250,000.
- **Business Practice Changes:** Defendants have undertaken and will continue to undertake reasonable steps to further secure their systems and environments, including changes and improvements that have been made or are being made to protect Settlement Class Members' Private Information.

8. Tell me more about the Medical Data Monitoring.

If you do not opt-out of the Settlement, you are *automatically* entitled to receive two years of CyEx's Medical Shield Complete. Medical Shield Complete combines a robust suite of both financial and identity data protection features combined with five (5) unique medical data monitoring categories while also providing insurance for financial, identity and medical fraud at no cost to the individual.

You do not need to submit a Claim Form to receive this Settlement Class Member Benefit.

The Notice you received by email or mail included a unique code to enroll in the monitoring. This enrollment code will become active for use within thirty days after the Effective Date of the Settlement, which is currently estimated to be January 15, 2027. Once the code becomes active, you may activate your monitoring services by visiting the CyEx enrollment website at <https://app.medicalshield.cyex.com/enrollment/activate/crowe>.

If you do not know your enrollment code, please contact the Settlement Administrator at (833) 930-0161 or use the "Contact Us" form on the Settlement Website.

9. Tell me more about the Cash Payment for Documented Out-of-Pocket Losses.

In addition to automatically receiving Medical Data Monitoring, you may also submit a Claim for a Cash Payment for unreimbursed Documented Out-of-Pocket Losses for up to \$2,500.

"Documented Out-of-Pocket Losses" include actual, documented and unreimbursed out-of-pocket costs or expenditures resulting directly from fraud or identity theft relating to the Data Incident, if the cost or expenditure: (i) is an actual, documented and unreimbursed monetary cost or expenditure due to fraud or identity theft; (ii) is fairly traceable to the Data Incident; (iii) occurred after the Data Incident and before March 7, 2026; and (iv) the Settlement Class Member made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring insurance and identity theft insurance.

You cannot be reimbursed for Documented Out-of-Pocket Losses if you have already been reimbursed for the same expenses by another source, including compensation provided in connection with any credit monitoring and identity theft protection product or through a financial institution's consumer fraud policies.

To receive a Cash Payment for Documented Out-of-Pocket Losses, you must submit a complete Claim Form with "reasonable" supporting documentation. Reasonable supporting documentation means documentation generated by a third party supporting your claim (i.e., telephone records, correspondence, receipts, etc.). Personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute proper documentation, but may be included to provide clarification, context, or support for other submitted reasonable supporting documentation.

If you do not submit reasonable supporting documentation, or if the Settlement Administrator rejects your Claim for any reason and you fail to cure the Claim, it will be rejected.

10. How will Cash Payments for Documented Out-of-Pocket Losses be calculated?

The Defendants will provide a total of up to \$250,000 for Cash Payments for Documented Out-of-Pocket Losses (up to \$2,500 per individual Claim) to Settlement Class Members who file a Valid Claim. Cash Payments to Settlement Class Members with Valid Claims will be reduced *pro rata* (proportionally) in the event the total of all Valid Claims exceeds the total amount provided.

11. Why what claims am I releasing if I stay in the Settlement?

Unless you opt-out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants about any of the legal claims this Settlement resolves. The Releases section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.MCNAdatabreachsettlement.com.

HOW TO GET A CASH PAYMENT FOR DOCUMENTED OUT-OF-POCKET LOSSES - SUBMITTING A CLAIM

12. How do I submit a Claim Form to get a Cash Payment for Documented Out-of-Pocket Losses?

You must submit a Claim Form by **October 19, 2026** to receive a Cash Payment for Documented Out-of-Pocket Losses. Claim Forms must be submitted, with supporting documentation, online at www.MCNAdatabreachsettlement.com by 11:59 p.m. ET, or by mail, postmarked by **October 19, 2026**, to the Settlement Administrator at:

Settlement Administrator – 83443
c/o Kroll Settlement Administration
P.O. Box 225391
New York, NY 10150-5391

Reminder: If you remain in the Settlement Class, you are *automatically* entitled to receive two years of Medical Data Monitoring (*see* Question 8). You do not need to submit a Claim Form to receive this Settlement Class Member Benefit.

13. When will I get Settlement Class Member Benefits?

The short answer is – after the Settlement is "finally approved" and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **November 16, 2026**, to decide whether to approve the Settlement and award attorneys' fees and costs for Class Counsel for representing the Settlement Class.

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 Class Member Benefits will be available as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes, the Court appointed Jeff Ostrow of Kopelowitz Ostrow P.A., Peter Prieto of Podhurst Orseck, P.A., and Stephanie Casey of Colson Hicks Eidson, P.A. to represent you and other Settlement Class Members as Class Counsel. You will not be charged directly for these lawyers.

If you want to be represented by your own lawyer, you may hire one at your own expense.

15. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court to award attorneys' fees of up to \$6,400,000, plus reimbursement of litigation costs of no more than \$1,313,000. If approved, these amounts will be paid by the Defendants.

EXCLUDING YOURSELF FROM THE SETTLEMENT

17. 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 to separately sue the Defendants about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The Opt-Out Deadline to submit an opt-out request from the Settlement is **October 19, 2026**.

To exclude yourself from the Settlement, you must submit a written opt-out request that includes the following information:

- A statement indicating a request to opt-out, e.g., "I would like to opt-out of the Settlement Class in *Crowe, et al., v. Managed Care of North America, Inc., et al.*, Case No. 0:23-cv-61065-AHS.";
- Your full name, mailing address, telephone number, and email address (if any);
- Your personal signature.

Your request to opt-out must be mailed to the Settlement Administrator at the address below, postmarked no later than **October 19, 2026**.

Settlement Administrator – 83443
c/o Kroll Settlement Administration LLC
ATTN: Opt-Out Request
P.O. Box 225391
New York, NY 10150-5391

"Mass" or "class" opt-outs filed by third parties are not permitted under the Settlement Agreement unless every request is signed by the individual Settlement Class Member.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits or Class Counsel's request for attorneys' fees and costs, Releases provided to the Defendants, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

To be considered by the Court, your objection must include:

- The case name and number, “*Crowe, et al., v. Managed Care of North America, Inc., et al.*,” Case No. 0:23-cv-61065-AHS”;
- Your full name, mailing address, telephone number, and email address (if any);
- All grounds for the objection, accompanied by any legal support for the objection known to you or your attorney;
- A statement disclosing any use of Artificial Intelligence (AI) by you or your attorney in drafting the objection and the platform(s) that were used;
- The number of times you have objected to a class action settlement within the five years preceding the date you are filing your objection in this case, the caption of each case in which you have made an objection, and a copy of any orders related to or ruling upon the prior objection(s) that were issued by the trial and appellate courts in each listed case;
- The identity of all attorneys who represent you, including any former or current attorney who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys’ Fees and Costs;
- The number of times in which your attorney and/or his or her law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which the attorney or the firm has made such objection and a copy of any orders related to or ruling upon the attorney’s or their law firm’s prior objections that were issued by the trial and appellate courts in each listed case in which your attorney and/or their law firm have objected to a class action settlement within the preceding five years;
- Whether you or your attorney will appear at the Final Approval Hearing;
- A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- Your signature (an attorney’s signature is not sufficient).

Objections must be filed with or sent to the Court, postmarked or shipped (e.g., if sent by FedEx), by **October 19, 2026** at the following address:

Clerk of the Court
United States District Court for the Southern District of Florida
299 East Broward Boulevard #108
Fort Lauderdale, Florida 33301

A copy of your objection also must be mailed to Class Counsel, Defendants’ Counsel, and the Settlement Administrator at the addresses below, postmarked no later than **October 19, 2026**.

CLASS COUNSEL	DEFENDANTS’ COUNSEL	SETTLEMENT ADMINISTRATOR
Jeff Ostrow KOPELOWITZ OSTROW P.A. 1 West Las Olas Blvd. Suite 500 Fort Lauderdale, FL 33301 Peter Pietro PODHURST ORSECK, P.A. 2525 Ponce de Leon Blvd. Suite 700 Coral Gables, FL 33134 Stephanie Casey COLSON HICKS EIDSON, P.A. 806 Douglas Rd. Suite 1200 Coral Gables, FL 33134	Allison Holt Ryan Alicia J. Paller HOGAN LOVELLS US LLP Columbia Square 555 13th St., NW Washington, D.C. 20004 Mark R. Cheskin HOGAN LOVELLS US LLP 600 Brickell Ave. Suite 2700 Miami, FL 33131	<i>Settlement Administrator – 83443.</i> c/o Kroll Settlement Administration P.O. Box 225391 New York, NY 10150-5391

19. What is the difference between objecting and opting out?

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 it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt-out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

20. When is the Court's Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **November 16, 2026 at 2:00 p.m. ET**, at the U.S. Federal Building and Courthouse, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301, to decide whether to approve the Settlement and whether award attorneys' fees and costs of up to \$6,400,000, plus reimbursement of litigation costs of no more than \$1,313,000. The date and time of this hearing may change without further notice. Please check www.MCNAdatabreachsettlement.com for updates.

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

IF YOU DO NOTHING

22. 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 Defendants and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement and will not be eligible to receive a Cash Payment for Documented Out-of-Pocket Losses, although you will still receive two years of Medical Data Monitoring.

GETTING MORE INFORMATION

23. 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.MCNAdatabreachsettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by telephone at (833) 930-0161, or by mail:

Settlement Administrator - 83443
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391