

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Newson, et al. v. Landmark Admin, LLC, et al.

District Court for Dallas County, Texas

If your Private Information was potentially accessible as a result of the Data Security Incident experienced by Landmark Admin, LLC from May 13, 2024 to June 17, 2024, you may be eligible for payment from a class action Settlement.

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

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

- A Settlement has been proposed in a class action lawsuit against Landmark Admin, LLC (“Landmark”), American Benefit Life Insurance Company, American Monumental Life Insurance Company, Capitol Life Insurance Company, Continental Mutual Insurance Company, Liberty Bankers Life Insurance Company and Accendo Insurance Company (collectively “Defendants”). The Settlement resolves claims related to the Data Security Incident that occurred from May 13, 2024 to June 17, 2024, in which Plaintiffs’ and Settlement Class Members’ Private Information was potentially implicated, accessed, compromised or impacted (the “Data Security Incident”).
- The Settlement Class includes all persons in the United States (including all territories and U.S. military installations worldwide) whose Private Information was potentially implicated, accessed, compromised, or impacted as a result of the Data Security Incident, including all persons who were mailed notification letters concerning the Data Security Incident. Excluded from the Settlement Class are: (a) Defendants’ officers and directors; and (b) any entity in which Defendants have a controlling interest. Also excluded from the Settlement Class are members of the judiciary to whom this case is assigned, and their families and members of their staff.
- Settlement Class Members who submit a valid and timely Claim Form may receive compensation for documented losses relating to the Data Security Incident, up to a total of \$2,500.00. In lieu of compensation for documented losses, Settlement Class Member may elect to receive a \$30 cash payment, subject to a downward *pro rata* adjustment.

Summary of Your Legal Rights and Options		Deadline
SUBMIT A CLAIM FORM	The only way to get a payment is to submit a valid and timely Claim Form.	Submitted online or postmarked by December 26, 2025
OPT OUT OF THE SETTLEMENT	Get no payment. Keep your right to file your own lawsuit against Defendants and other Released Persons about claims resolved by this Settlement.	Postmarked by November 25, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	Tell the Court the reasons why you do not believe the Settlement should be approved. You can also ask to speak to the Court at the hearing on January 29, 2026 about the fairness of the Settlement, with or without your own attorney.	Postmarked by November 25, 2025
DO NOTHING	Get no payment and be bound by the terms of the Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court must still decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement after any appeals are resolved.

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BASIC INFORMATION

1. Why did I get this notice?

You received this Notice because you have been identified as a person whose Private Information was potentially accessible as a result of the Data Security Incident, and you may have previously received a notification letter about the Data Security Incident.

A Court authorized this Notice because you have a right to know about your rights under the proposed class action Settlement before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, the Settlement Administrator appointed by the Court will provide the benefits and make the payments that the Settlement allows, and any and all legal claims against Defendants and other Released Persons will be released and dismissed.

This Notice explains the Lawsuit, the Settlement, your rights, what benefits are available, who is eligible for them, and how to get them. The Lawsuit is *Newson, et al. v. Landmark Admin, LLC, et al.*, Case No. DC-25-07674, pending in the District Court for Dallas County, Texas. The people who filed the Lawsuit are called the Plaintiffs and the entities they sued are called the Defendants.

2. What is this lawsuit about?

The Lawsuit alleges that Defendants were responsible for failing to prevent the Data Security Incident, and asserts claims such as negligence, breach of implied contract, unjust enrichment, breach of third-party beneficiary contract, breach of confidence, and intrusion upon seclusion/invasion of privacy. Defendants deny all of the claims and allegations of wrongdoing.

3. What is a class action?

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

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of a trial, and Settlement Class Members can get benefits or compensation. The Plaintiffs and Settlement Class Counsel think the Settlement is in the best interest of the Settlement Class.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class is defined as: all persons in the United States (including all territories and U.S. military installations worldwide) whose Private Information was potentially implicated, accessed, compromised, or impacted as a result of the Data Security Incident, including all persons who were mailed notification letters concerning the Data Security Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (a) Defendants' officers and directors; and (b) any entity in which Defendants have a controlling interest. Also excluded from the Settlement Class are members of the judiciary to whom this case is assigned, their families and members of their staff.

7. What should I do if I am not sure whether I am included?

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling the Settlement Administrator at 1-855-592-5777, sending an email to info@LandmarkDataSettlement.com, or you can visit www.LandmarkDataSettlement.com for more information.

THE SETTLEMENT BENEFITS

8. What does the Settlement Provide?

Under the Settlement, the entire amount that Landmark will be obligated to pay, including all settlement benefits to be paid for valid claims for monetary benefits, the costs of notice and settlement administration, the amount of Plaintiffs' Service Awards payment and the amount of Settlement Class Counsel's attorneys' fees and expenses, is subject to an overall cap of \$6,000,000.00.

Business Practice Commitments. Landmark agrees to continue to provide security for Private Information. Landmark agrees to pay for such remedial costs separate and apart from other settlement benefits. Landmark is willing to provide, at the request of Settlement Class Counsel, a confidential declaration describing information security improvements it has undertaken since the Data Security Incident and estimating the cost of these improvements

9. What can I get from the Settlement?

Settlement Class Members who submit a valid and timely Claim Form may choose one of the applicable claim categories below.

Claim A: Documented Economic Losses. Settlement Class Members may be eligible for compensation for documented losses, up to a total of \$2,500.00 per claimant, upon submission of a valid Claim Form and supporting documentation provided that: (i) the loss is an actual, documented, and unreimbursed monetary loss stemming from fraud or identity theft or as otherwise related to the Data Security Incident; (ii) the loss was more likely than not caused by the Data Security Incident; and (iii) the loss was incurred after the timeframe of the Data Security Incident.

Claim B: *Pro Rata* Cash Payment. In lieu of Claim A, Settlement Class Members may elect to receive a \$30 cash payment, subject to a *pro rata* adjustment downward in the event that the \$6,000,000.00 aggregate cap is exceeded.

10. What am I giving up if I stay in the Class?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Defendants and other Released Persons concerning the claims released by this Settlement. The Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The entire Settlement Agreement can be viewed at www.LandmarkDataSettlement.com.

How to Get a Payment – Making A Claim

11. How can I get a payment?

To make a claim for monetary compensation, you must complete and submit a valid Claim Form by **December 26, 2025**. Claim Forms may be submitted online by visiting the Settlement Website at www.LandmarkDataSettlement.com or mailed to the Settlement Administrator postmarked by **December 26, 2025** to:

Landmark Settlement Administrator
P.O. Box 1591
Baton Rouge, LA 70821

The Settlement Administrator will review and evaluate each Claim Form, including any required documentation submitted, for timeliness, completeness, and validity.

12. When will I get my payment?

The Court will hold a Final Approval Hearing on **January 29, 2026 at 10:30 a.m.** to decide whether to approve the Settlement. Payments will be made after the Settlement is approved and becomes Final (meaning there is no appeal from the order approving the Settlement). Updates

regarding the Settlement will be posted on the Settlement Website at www.LandmarkDataSettlement.com.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes. The law firms of Milberg Coleman Bryson Phillips Grossman, PLLC, Siri & Glimstad LLP, and Murphy Law Firm represent the Settlement Class. These lawyers are called Settlement Class Counsel. You will not be charged for their services.

14. Should I get my own lawyer?

If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in court for you if you want someone other than Settlement Class Counsel to speak for you. You may also appear for yourself without a lawyer.

15. How will the lawyers be paid?

The attorneys representing the Class have not yet received any payment for their legal services or any reimbursement of the expenses they have incurred. Settlement Class Counsel will seek a combined award of attorneys' fees and expenses not to exceed \$2,000,000.00, and Service Awards to be paid to each Plaintiff in an amount not to exceed \$1,500.00 each to recognize Plaintiffs for their efforts in the Lawsuit and commitment on behalf of the Settlement Class. The Court will determine whether to approve the amount of fees and expenses requested by Settlement Class Counsel and the proposed Service Awards to the Plaintiffs.

The Plaintiffs are Raymond Newson, Britton Bryant, Donald Tanner, Edna Whitten, Folayan Payne, Drenetha Goff, Kara Montague, Karina Barratt, Lynda Roberts, Randy Jackson, Rozalynn Fisher, Shalene Willis and Sherika Dodson.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I get out of the Settlement?

If you are a Settlement Class Member and you do not want to be bound by the Settlement Agreement, and you want to keep your right, if any, to sue Defendants or other Released Persons on your own about the legal issues in this Lawsuit, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement Class.

To request exclusion from the Settlement Class, you must personally sign and timely submit an Opt-Out Request to the Settlement Administrator, mailed to the address below and postmarked no later than **November 25, 2025**.

Landmark Settlement Administrator
P.O. Box 1591
Baton Rouge, LA 70821

For an Opt-Out Request to be valid, it must include:

- 1) Your full name, address, and telephone number;
- 2) Your personal and original signature (or the original signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on behalf of the Settlement Class Member with respect to a claim or right, such as those in the Lawsuit);
- 3) Clear intent to be excluded from the Settlement Class, to be excluded from the Settlement, not to participate in the Settlement, and/or to waive all rights to the benefits of the Settlement.

An Opt-Out Request or other request for exclusion that does not fully comply with the requirements above, or that is not timely submitted or postmarked, or that is sent to an address other than that listed above, will be invalid, and the person submitting such request will be treated as a Settlement Class Member and be bound by the Settlement Agreement, including the Release.

17. If I am a Settlement Class Member and don't opt out, can I sue the Defendants for the same thing later?

No. You must opt-out of the Settlement to keep your right to sue Defendants or other Released Persons for any of the claims resolved by the Settlement.

18. What happens if I opt out?

If you opt-out of the Settlement, you will not have any rights as a member of the Settlement Class. You will receive no benefits or compensation under the Settlement Agreement. You will not be bound by the Settlement, the Release, or by any further orders or judgments in this case. You will keep the right, if any, to sue on the claims alleged in the Lawsuit at your own expense.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

19. How do I tell the Court if I don't like the Settlement?

If you are a Settlement Class Member and you do not opt-out of the Settlement, you can object to the Settlement Agreement. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. A written Objection

must be filed with the Clerk of Court and mailed or hand delivered concurrently upon Settlement Class Counsel and Defendants' Counsel no later than **November 25, 2025**.

Your Objection must:

- 1) State your full name, current address, telephone number, and email address (if any);
- 2) Contain your original signature;
- 3) Set forth information identifying you as a Settlement Class Member, including proof that you are within the Settlement Class (*e.g.*, copy of the Notice or copy of original notice of the Data Security Incident);
- 4) Set forth a statement of all grounds for the objection, including any legal support for the objection that you believe applicable;
- 5) Identify all counsel representing you;
- 6) State whether you or your counsel will appear at the Final Approval Hearing, and
- 7) Contain the signature of your duly authorized attorney or other duly authorized representative (if any), along with documentation setting forth such representation.

CLERK OF COURT	SETTLEMENT CLASS COUNSEL	DEFENDANTS' COUNSEL
193 rd District Court George L. Allen, Sr. Courts Building 600 Commerce Street Box 822 Dallas, TX 75202	Gary M. Klinger MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC 227 W. Monro Street, Suite 2100 Chicago, IL 60606 Tyler J. Bean SIRI & GLIMSTAD LLP 745 Fifth Avenue, Suite 500 New York, NY 10151 A. Brooke Murphy MURPHY LAW FIRM 4116 Will Rogers Pkwy, Suite 700 Oklahoma City, OK 73108	David M. Ross WILSON ELSE LLP 1500 K Street, NW, Suite 330 Washington, DC 20005 William "Pat" Huttenbach Melinda M. Riseden CRAIN CATON & JAMES Five Houston Center, 1401 McKinney Street, Suite 1700 Houston, TX 77010 Donald M. Houser ALSTON & BIRD LLP One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309

You are not required to attend the Final Approval Hearing. If you intend to appear at the Final Approval Hearing, either with or without counsel, you must also file with the Court, and mail or hand-deliver to Settlement Class Counsel and Defendants' Counsel, a notice of appearance no later than **November 25, 2025**.

20. What's the difference between objecting and opting out?

Objecting is telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you are a Settlement Class Member and do not opt-out of the Settlement. Opting-out of the Settlement is telling the Court that you don't want to be part of the Settlement. If you opt-out of the Settlement, you cannot object to it because it does not affect you.

THE COURT'S FINAL APPROVAL HEARING

21. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing (also called the Fairness Hearing) on **January 29, 2026 at 10:30 a.m.** At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate; Settlement Class Counsel's application for attorneys' fees and expenses; and whether to approve Service Awards to the Plaintiffs. If there are Objections, the Court will consider them. The Court may choose to hear from people who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to Settlement Class Members. Be sure to check the Settlement Website, www.LandmarkDataSettlement.com for updates.

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

No. Settlement Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an Objection, you do not have to come to the hearing to talk about it. As long as you filed your written Objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 19 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF I DO NOTHING

24. What happens if I do nothing at all?

If you do nothing, you will not receive any compensation from this Settlement. If the Court approves the Settlement, you will be bound by the Settlement Agreement and the Release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants or Released Persons about the issues involved in the Lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

25. Are more details about the Settlement available?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, available at www.LandmarkDataSettlement.com.

26. How do I get more information?

Visit the Settlement Website at www.LandmarkDataSettlement.com, where you will find more information, including the Claim Form, a copy of the Settlement Agreement, and answers to questions about the Settlement and other information to help you determine whether you are eligible for payment.

Contact the Settlement Administrator at 1-855-592-5777, via email at info@LandmarkDataSettlement.com, or by writing to:

Landmark Settlement Administrator
P.O. Box 1591
Baton Rouge, LA 70821

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