

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Dusterhoft v OneTouchPoint Corp., Case No. 2025CV002181
Circuit Court of Waukesha County, Wisconsin

*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 OneTouchPoint Corp. (“Defendant” or “OTP”) in a class action lawsuit concerning a cybersecurity incident it suffered that resulted in potential compromise of the Private Information of current and former patients or subscribers of OTP’s clients and OTP employees’ Private Information in April 2022 (the “Data Incident”).
- The lawsuit is captioned *Dusterhoft v. OneTouchPoint, Inc.*, Case No. 2025CV002181, pending in the Circuit Court of Waukesha County, Wisconsin (the “Lawsuit”).
- OTP denies each and all of the claims and contentions alleged against it in the Lawsuit and denies all charges of wrongdoing or liability alleged (or which could be alleged) in the Lawsuit but has agreed to a settlement to avoid the costs and risks associated with continuing the litigation.
- You are included in the Monetary Settlement Class if you are a resident of the United States and its territories whose Private Information was determined by OTP’s investigation to have been impacted in the Data Incident in or about April 2022, or were a plaintiff in litigation arising from the Data Incident. You are included in the Injunctive Relief Settlement Class if you were sent notice by OTP of potential impact to your Private Information in the April 2022 Data Incident, but for whom the impact could not be confirmed.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF MONETARY SETTLEMENT CLASS MEMBERS’ LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way for Monetary Settlement Class Members to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way for a Monetary Settlement Class Member to submit a Claim Form is online at www.OTPDDataIncident.com. If they prefer, they can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. They may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	NOVEMBER 16, 2026
OPT OUT OF THE SETTLEMENT	Monetary Settlement Class Members can choose to opt out of the Settlement and receive no payment. This option allows them to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. They can hire their own legal counsel at their own expense.	OCTOBER 16, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If a Monetary Settlement Class Member does not opt out of the Settlement, they may object to it by writing to the Court about why they don’t like the Settlement. They may also ask the Court for permission to speak about their objection at the Final Approval Hearing. If they object, they may also file a claim for Settlement benefits. Injunctive Relief Class Members may also object.	OCTOBER 16, 2026
DO NOTHING	Unless a Monetary Settlement Class Member opts out of the settlement, they are automatically part of the Settlement. If they do nothing, they will not receive benefits from this Settlement and they will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant 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.

	For complete information and to file a claim, scan this QR code to go directly to the Settlement website, www.OTPDDataIncident.com
---	---

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION2

WHO IS IN THE SETTLEMENT3

THE SETTLEMENT BENEFITS3

SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS4

THE LAWYERS REPRESENTING YOU5

EXCLUDING YOURSELF FROM THE SETTLEMENT5

COMMENTING ON OR OBJECTING TO THE SETTLEMENT6

THE COURT’S FINAL APPROVAL HEARING6

IF I DO NOTHING7

GETTING MORE INFORMATION7

BASIC INFORMATION

1. Why was this Notice issued?

The Court of Waukesha County, Wisconsin authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit, and about all 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 captioned *Dusterhoft v. OneTouchPoint, Inc.*, Case No. 2025CV002181, pending in the Circuit Court of Waukesha County, Wisconsin. The persons who filed this lawsuit are called the “Plaintiffs” and the entity they sued, OTP, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that private information of current and former individuals maintained by OTP was potentially compromised in April 2022, when OTP suffered a cybersecurity incident (the “Data Incident”).

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 known as “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “class” or “settlement class members.” One court resolves the lawsuit for all class members, except for those who opt out from a settlement. In this Settlement, the Plaintiffs and Monetary Relief Class Representatives are Sheila Crosby, Richard Dusterhoft, Robin Guertin, Michael Meza, Shira Haid, Aria Nardi, Jeffrey Neil Young, and Marcie Strickland. Donna Gear, Andrew Gibson, Vera Hays,

Tina Ingram, Nakia King, Crystal Lamb, Thomas Luca, and Cynthia Saffo, are Injunctive Relief Class Representatives. Everyone included in this Lawsuit are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. Plaintiffs and the Defendant 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. The 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 Settlement Class is split into two classes:

1. The “Monetary Settlement Class”:
 - a. All persons in the United States and its territories whose Private Information was determined by OTP’s investigation to have been impacted in the Data Incident in or about April 2022, as well as those named as plaintiffs in the Lawsuit and/or this Litigation.
2. The “Injunctive Relief Settlement Class”:
 - a. All persons in the United States and its territories who were sent notice by OTP of potential impact to their Private Information in the April 2022 Data Incident, but for whom the impact could not be confirmed.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Classes are: (a) Defendant’s officers and directors; (b) any entity in which Defendant has a controlling interest; and (c) the affiliates, legal representatives, attorneys, successors, heirs, and assigns of Defendant. Also excluded from the Settlement Classes are members of the judiciary to whom this case is assigned, their families and members of their staff.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator at:

Email: OTPDDataIncident@noticeadministrator.com

Call toll-free, 24/7: **866-996-3808**

By mail: OTP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2005, Chanhassen, MN 55317-2005.

You may also view the Settlement Agreement at www.OTPDDataIncident.com.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

OTP will provide a number of benefits under the Settlement Agreement to Monetary Settlement Class Members. They may claim compensation for Ordinary Losses, Compensation for Extraordinary Losses, Compensation for Time Spent, or an Alternative Cash Payment. Monetary Settlement Class Members may also claim two-years of Credit Monitoring.

Compensation for Ordinary Losses. Defendant will provide to Monetary Settlement Class Members who make valid claims compensation for unreimbursed losses, such as: Out-of-pocket expenses, including bank fees, long-distance phone charges, data charges, postage, and fees for credit reports, credit monitoring, or other identity theft insurance. The compensation is capped at \$500 per Claimant.

Compensation for Extraordinary Losses. Defendant will provide compensation to Monetary Settlement Class Members who make valid claims for proven monetary losses, professional fees (e.g., attorneys' fees, accountants' fees), and fees for credit repair services incurred as a result of the Data Incident. The compensation is capped at \$5,000 per Claimant.

Compensation for Time Spent. Defendant will provide to Monetary Settlement Class Members who make valid claims \$25 per hour, for a maximum of four (4) hours (or \$100 maximum), upon a submission of a Claim and attestation of time spent responding to the Data Incident.

Alternative Cash Payment. In lieu of claiming compensation for ordinary losses, extraordinary losses, and time spent, Monetary Settlement Class Members who submit a valid and timely claim may elect to receive a one-time \$75 payment without the need to document losses or attest to time spent as a result of the Incident.

Credit Monitoring. In addition to claiming compensation, Monetary Settlement Class Members who submit a valid and timely claim may elect to receive a two-year membership of one-bureau credit monitoring with at least \$1 million in fraud protection.

Injunctive Relief means the Defendant has agreed to make changes to its cyber security. Members of the Injunctive Relief Settlement Class will benefit from the steps that Defendant has taken, or will take, to remediate the Data Incident and enhance its security in the relevant systems for a period of no less than five (5) years.

If you have questions about any of these benefits, or how to file a claim, you can contact the Settlement Administrator at:

Email: OTPDDataIncident@noticeadministrator.com

Call toll-free, 24/7: **886-996-3808**

By mail: OTP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2005, Chanhassen, MN 55317-2005.

You may also view the Settlement Agreement at www.OTPDDataIncident.com.

9. What claims am I releasing if I stay in the Settlement Class?

Unless a Monetary Settlement Class Member opts out of the Settlement, they cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The "Release" section of the Settlement Agreement together with the Amendment to Class Action Settlement Agreement describe the legal claims that they give up if they remain in the Settlement Class. The Settlement Agreement and Amendment to Class Action Settlement Agreement are available for review at www.OTPDDataIncident.com.

Injunctive Relief Class Members shall be deemed to have, and by operation of the Judgment shall have, fully, finally, and forever released, relinquished, and discharged the Released Parties from any and all claims for injunctive and/or declaratory relief arising out of, or relating to, the Data Incident, but retain their rights to other claims being released by Monetary Settlement Class Members.

SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS

10. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.OTPDDataIncident.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at: OTP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2005, Chanhassen, MN 55317-2005.

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll-free, 866-996-3808, by email at OTPDDataIncident@noticeadministrator.com, or by U.S. mail at the address above.

11. What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by November 16, 2026. If you are submitting a claim by U.S.

Questions? Call 866-996-3808 Toll-Free or Visit www.OTPDDataIncident.com

mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is postmarked no later than November 16, 2026.

12. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on November 18, 2026. 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 benefits will be distributed if the Court grants final approval of the Settlement and after any appeals are resolved, or after the period to seek an appeal has expired.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes, the Court appointed Gary F. Lynch of Lynch Carpenter, LLP and Gary M. Klinger of Milberg, PLLC as Interim Co-Lead Counsel (collectively, “**Class Counsel**”).

14. Should I get my own lawyer?

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

15. How will Class Counsel be paid?

Class Counsel will seek Court approval for attorneys’ fees and litigation costs not to exceed \$1,500,000. These fees and costs, as well as the costs of administration, will be paid by OTP.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I opt out of the Settlement?

If you are a Monetary Settlement Class Member and do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendant about the legal issues in this case, there are steps that you must take to exclude yourself from the Settlement Class. This is called requesting an exclusion from, or “opting out” of the Settlement Class. The deadline to submit a request for exclusion from the Settlement is October 16, 2026.

To exclude yourself from the Settlement, you must individually sign and timely submit written notice of such intent to the designated Post Office box established by the Claims Administrator. Monetary Settlement Class Members will only be able to submit an opt-out request on their own behalf; mass or class opt-outs will not be permitted. The written notice must clearly manifest a person’s intent to be excluded from the Monetary Settlement Class.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, **postmarked no later than October 16, 2026.**

OTP Data Incident Settlement
ATTN: Exclusion Request
c/o Analytics Consulting LLC
PO Box 2005
Chanhassen, MN 55317-2005

If you exclude yourself, you are telling the Court that you do not want to be part of the monetary relief portion of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

17. 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 a portion or all of the Settlement, you can object to it, if you choose. You can give reasons why you think the Court should not approve it. The Court will consider your views.

For an objection to be considered by the Court, the objection must include the following, or information substantially similar to the follow:

1. The title of the case;
2. Your name, address, and telephone number;
3. All legal and factual bases for any objection;
4. And copies of any documents that the objector was the court to consider.

To be timely, a written notice of an objection containing the above information must be mailed to Class Counsel and counsel for OTP, no later than **October 16, 2026**.

Class Counsel	Counsel for OTP
Gary F. Lynch Lynch Carpenter, LLP 1133 Penn Ave, Floor 5 Pittsburg, PA 15222 Email: gary@lcllp.com Gary M. Klinger Milberg, PLLC 227 W Monroe St, Ste 2100 Chicago, IL 60606	Jordan O'Donnell Paulyne Gardner Mullen Coughlin LLC 426 W Lancaster Ave., Ste 200 Devon, PA 19333 jsodonnell@mullen.law pgardner@mullen.law

If you do not comply with the requirements for objecting you will waive and forfeit any and all rights you may have to appear separately and/or to object to the Settlement, and will be bound by all the terms of the Settlement and by all proceedings, orders and judgments in the Litigation.

18. 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

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

The Court will hold a final approval hearing on November 18, 2026, at 10:00 am at the Waukesha County Circuit Court, 515 W Moreland Blvd, Waukesha, WI 53188.

At the final approval hearing, the Court will consider whether to approve the Settlement, how much attorneys' fees and costs to award to Class Counsel for representing the Settlement Class, and whether to award a Service Award of \$1,000 to the Plaintiffs who brought this Action on behalf of the Settlement Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your attorney may ask permission to speak at the hearing at your own cost (**See Question 17**).

The date and time of this hearing may change without further notice. Please check www.OTPDataIncident.com for updates.

20. 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. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider an objection that was filed on time.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you are a Monetary Settlement Class Member and you do nothing, you will give up the rights described in **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues resolved by this Settlement as more fully described in the Settlement Agreement and Amendment to Class Action Settlement Agreement available for review at www.OTPDataIncident.com. In addition, if you do nothing, you will not receive a benefit from this Settlement.

GETTING MORE INFORMATION

22. 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.OTPDataIncident.com.

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: OTPDataIncident@noticeadministrator.com

Call toll-free, 24/7: **866-996-3808**

By mail: OTP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2005, Chanhassen, MN 55317-2005.

You may also view the Settlement Agreement at www.OTPDataIncident.com.

Publicly filed documents can also be obtained by visiting the Waukesha County Circuit Court.

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



For complete information and to file a claim, scan this QR code to go directly to the Settlement website,

www.OTPDataIncident.com