

Superior Court of the State of Washington, Pierce County

In re: Pierce County Library System Data Breach Litigation

Case No. 25-2-11297-2

Class Action Notice

Authorized by the Superior Court of the State of Washington for Pierce County

Are you a
current or
former
employee or
family member
of the employee
or former
contractor of the
Pierce County
Library System?

There is a
settlement of a
lawsuit related to
an alleged data
incident

You may be
entitled to money
and credit
monitoring &
identity
restoration
services.

To be part of this
settlement, you
should:

Read this notice.

Respond by
September 28,
2026.

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected. ***Please read this Notice carefully and completely.***
- You can learn more at: www.PierceCountyLibraryDataSettlement.com.

Questions? Call (833) 421-7302 Toll-Free or Visit
www.PierceCountyLibraryDataSettlement.com

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *In re: Pierce County Library System Data Breach Litigation*, Case No. 25-2-11297-2. A proposed settlement has been reached in the lawsuit involving Pierce County Library System (the “Defendant” or “PCLS”), relating to the cyber incident perpetrated against PCLS, and which PCLS disclosed in July 2025 (the “Data Incident”). **You received this notice because you may be a member of the group of people affected, called the “settlement class.”** This notice gives you a summary of the terms of the proposed settlement, explains what rights settlement class members have, and helps settlement class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a settlement class member. Then, decide if you want to:

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.PierceCountyLibraryDataSettlement.com .	September 28, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no benefits. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own legal counsel at your own expense.	August 28, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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	August 28, 2026

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
	Hearing. If you object, you may also file a claim for Settlement benefits.	
DO NOTHING	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 Defendant related to the legal claims resolved by this Settlement.	No Deadline

The Court in charge of this case still has to decide whether to finally approve the Settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **August 28, 2026**

Your deadline to submit a claim form: **September 28, 2026**

Settlement approval hearing: **October 9, 2026**

Basic Information

What is this lawsuit about?

This lawsuit concerns the cyber incident perpetrated against PCLS, which PSLC disclosed in July 2025, that may have impacted Personally Identifiable Information of PCLS's current and former employees and their family members, as well as current and former contractors . PCLS denies all claims alleged against it and denies all charges of wrongdoing or liability. The Settlement is not an admission of wrongdoing or an indication that PCLS has violated any laws. Rather, the Parties have agreed to settle the class action lawsuit to avoid the

uncertainties and expenses associated with ongoing litigation.

What is a class action?

In a class action, one or more individuals called the Plaintiff(s) or Class Representative(s) sue on behalf of a group or “class” of people with similar claims. In a class action settlement, one court resolves the lawsuit for all class members, except for those who opt-out of the settlement.

Why is there a Settlement?

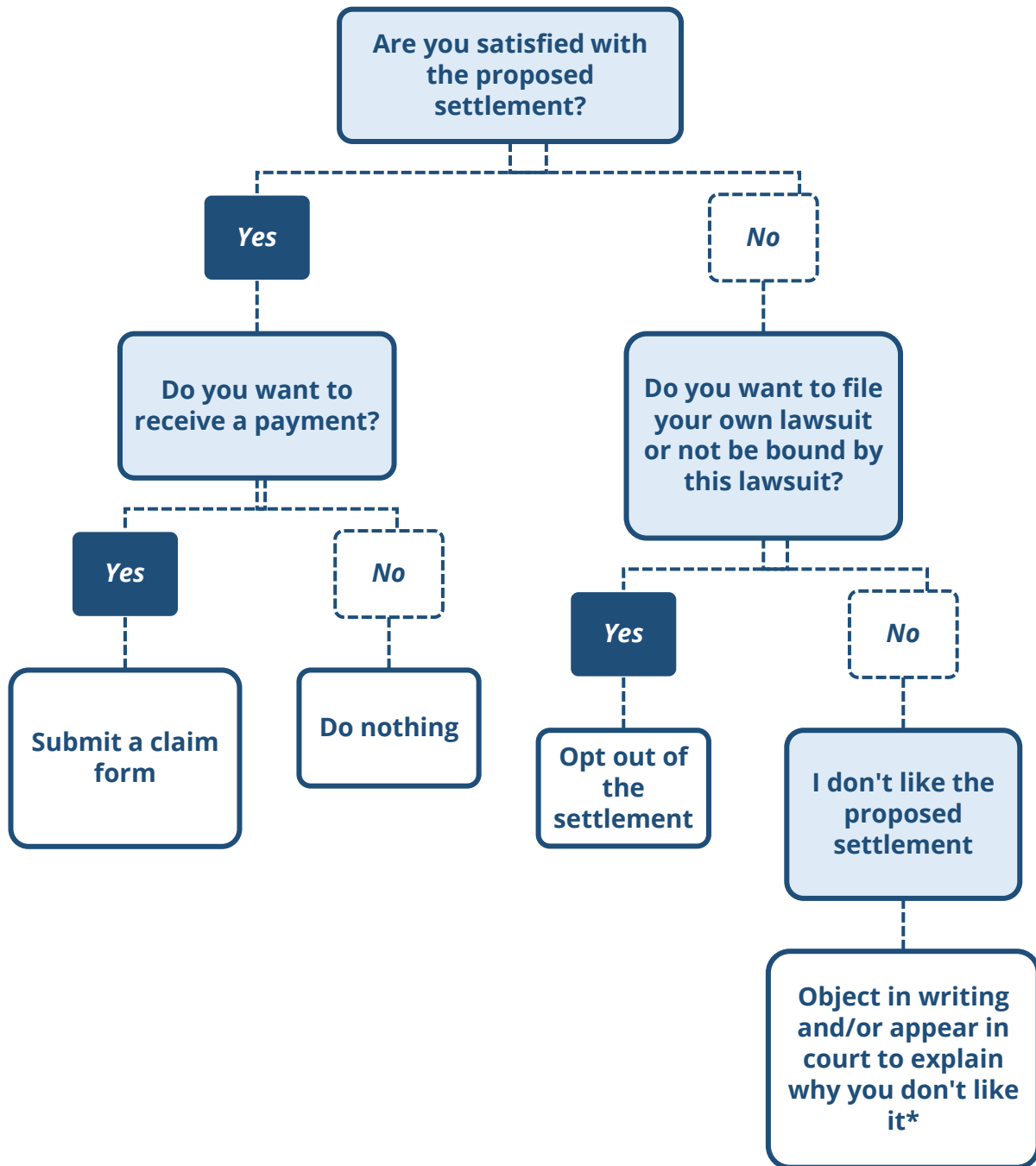
The Court did not decide in favor of the Plaintiffs or the Defendant. Plaintiffs and the Defendant have agreed to a Settlement to avoid the uncertainties and expenses associated with ongoing litigation, and to allow the Settlement Class Members to receive compensation sooner rather than, if at all, after the completion of a trial. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

How do I weigh my options?

You have four options. You can stay in the Settlement and submit a claim, you can opt out of the settlement, you can object to the settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt-out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

What is the best path for me?



**You can object to the settlement AND submit a claim form to receive payment.*

Who is in the Settlement Class?

Who is included in the Settlement Class?

The Settlement Class is defined as: all current and former employees, and their family members, as well as current and former contractors who received notice from Defendant whose personal information may have been impacted in the Data Incident.

Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (i) PCLS and PCLS's parents, subsidiaries, affiliates and any entity in which PCLS has a controlling interest; (ii) all individuals who make a timely election to be excluded from this proceeding using the correct protocol for requesting exclusion; (iii) the attorneys representing the Settling Parties in the Litigation; (iv) all judges assigned to hear any aspect of the Litigation, as well as their immediate family members; and (v) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the Data Incident, or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator by mail, email, or by calling toll-free.

Pierce County Library System Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799
info@PierceCountyLibraryDataSettlement.com
(833) 421-7302

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

The Settlement Benefits

What does the Settlement provide?

Settlement Class Members may submit claims for: (1) Compensation for Ordinary Losses, (2) Compensation for Extraordinary Losses, (3) Reimbursement for Attested Lost Time, (4) an Alternative Cash Payment, and/or (5) Credit Monitoring and Identity Restoration Services

The following benefits are subject to a \$385,000 aggregate cap: (1) Reimbursement for Monetary Losses, (2) Reimbursement for Attested Lost Time, and (3) an Alternative Cash Payment. If the total approved claims for these benefits exceed \$385,000, the benefits will be reduced, *pro rata*, so that the volume of all payments does not exceed \$385,000.

The following costs are not subject to the aggregate cap and will not count towards it: (1) Notice and Administrative Expenses, (2) Fee Award and Expenses, as approved and awarded by the Court, (3) Service Awards, as approved and awarded by the Court, and (4) Credit Monitoring and Identity Restoration Services.

The Settlement benefits are summarized below. Visit www.PierceCountyLibraryDataSettlement.com for a full description of these benefits.

Compensation for Ordinary Losses. Participating Settlement Class Members can claim up to a total of \$250 per person for ordinary out-of-pocket losses incurred as a result of the Data Incident, including, without limitation, bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, gasoline for local travel, fees for credit reports, credit monitoring, or other identity theft insurance product (incurred on or after April 15, 2025, and fairly traceable to the Data Incident).

Compensation for Extraordinary Losses. Participating Settlement Class Members can claim up to a total of \$4,000 per person for extraordinary out-of-pocket losses incurred as a result of the Data

Incident. Claims for Extraordinary Losses must: (1) be an actual, documented, and unreimbursed monetary loss stemming from fraud or identity theft; (2) establish that the loss was more likely than not caused by the Data Incident; (3) establish that the loss was incurred after the date of the Data Incident; and (4) establish that the loss is not already covered by one or more of the other reimbursement categories.

Settlement Class Members submitting claims for Ordinary and Extraordinary Losses must submit third-party documentation supporting their claims. This can include receipts or other documentation that document the costs incurred but does not include documentation that is “self-prepared” by the claimant. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support to other submitted documentation.

Reimbursement for Attested Lost Time. All Settlement Class Members are eligible to make a claim of up to \$20 per hour for time spent remedying issues related to the Data Incident with an attestation stating how the time was spent and that it was related to the Data Incident. Claims for Attested Lost Time are subject to a 4-hour cap (\$80 maximum payment) and can be combined with any other Settlement benefit, except for a claim for the Alternative Cash Payment.

Credit Monitoring and Identity Restoration Services. All Settlement Class Members are eligible to make a claim for three (3) years of Credit Monitoring from one credit reporting bureau and Identity Restoration Services with \$1,000,000 identity theft insurance with no deductible.

Are there other Settlement Class Member Benefits?

Business Practices Changes: As part of the settlement negotiations, Settlement Class Counsel received assurances that Defendant implemented and has plans to implement a number of business practice changes and security enhancements designed to prevent future data security incidents. Defendant has agreed to provide information regarding the specific changes to Settlement Class Counsel in a confidential declaration prior to the filing of any Final

Approval Motion, which shall be available to be filed under seal for the Court's review if it so requests.

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

Unless you opt out of the Settlement, you 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 "Releases" section of the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available for review at www.PierceCountyLibraryDataSettlement.com.

Submitting a Claim Form for Settlement Benefits

How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.PierceCountyLibraryDataSettlement.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at:

Pierce County Library System 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 calling toll-free (833) 421-7302, by emailing info@PierceCountyLibraryDataSettlement.com, or by writing to the address above.

What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by September 28, 2026. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is postmarked no later than September 28, 2026. In the event your mailed claim is not postmarked,

it will be deemed timely if received within seven days of September 28, 2026.

When will the Settlement benefits be issued?

The Court will hold a final approval hearing on October 9, 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

Do I have a lawyer in the case?

Yes, the Court appointed M. Anderson Berry of Emery Reddy, PC and Kaleigh Boyd of Tousley Brain Stephens PLLC to represent you and other Settlement Class Members as Settlement Class Counsel.

M. Anderson Berry
EMERY REDDY, PC
600 Stewart St., Suite 1100
Seattle, WA 98101

Kaleigh Boyd
McNAUL EBEL PLLC
600 University Street, Suite 2700
Seattle, Washington 98101

Should I get my own lawyer?

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

How will Settlement Class Counsel be paid?

Settlement Class Counsel will file a Fee and Expense Application for an award of attorneys' fees of \$220,000 to be paid by Defendant, separate and apart from any other sums agreed to under the Settlement.

Settlement Class Counsel's Fee and Expense Application will also include a request for Service Awards for each of the Settlement Class Representatives not to exceed \$2,500 each (or \$12,500 total) in recognition of their contributions to this case. The Court may award less than these amounts.

Settlement Class Counsel's Fee and Expense Application will be available at www.PierceCountyLibraryDataSettlement.com after it is filed with the Court.

Excluding Yourself from the Settlement

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, 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 August 28, 2026.

To exclude yourself from the Settlement, you must submit a written request for exclusion that includes the following information:

- (i) the name of the proceeding: *In re: Pierce County Library System Data Breach Litigation*. Case No. 25-2-11297-2, pending in the Superior Court of the State of Washington, Pierce County;
- (ii) Settlement Class Member's full name;
- (iii) Settlement Class Member's current mailing address;
- (iv) Settlement Class Member's personal signature; and
- (v) the words "Request for Exclusion" or a comparable statement that the individual does not wish to participate in the Settlement, or

some other clear manifestation of the intent to opt-out of the Settlement.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, **postmarked no later than August 28, 2026 (or, if not postmarked, received within seven days of August 28, 2026).**

Pierce County Library System Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

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.

You may only exclude yourself— not any other person. **Any Settlement Class Member who does not file a timely request for exclusion in accordance with this section will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.**

Commenting on or Objecting to the Settlement

How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement 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 a valid objection under the Settlement, it must include or substantially comply with the following: (1) the name of the proceeding, (2) the Settlement Class Member's full name, current mailing address, email address, and telephone number, (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection, (4) the identity of any attorneys representing the objector, (5) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at

the Final Approval Hearing, (6) a statement identifying all class action settlements objected to by the Settlement Class Member in the previous five (5) years, and (7) the signature of the Settlement Class Member or the Settlement Class Member's attorney. The Court, in its discretion, may authorize additional discovery of objectors.

To be timely, an objection must be mailed to the Settlement Administrator, so it is postmarked no later than August 28, 2026. In the event the mailing is not postmarked, it will be deemed timely if received within seven days of August 28, 2026.

Pierce County Library System Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

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

When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **October 9, 2026 at 9:00 a.m.**, at the Pierce County Justice Center, 1501 Market Street Tacoma, WA 98402.

At the final approval hearing, the Court will consider whether to approve the Settlement, Settlement Class Counsel's Fee and Expense Application, and Service Awards to the Settlement Class Representatives. The Court will also consider any objections to the Settlement that were submitted in accordance with the requirements outlined above.

If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost.

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

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 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.

If I Do Nothing

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 Defendant and the Released Parties described in Section VIII of the Settlement Agreement about the legal issues resolved by this Settlement. In addition, if you do nothing, you will not receive any benefits from this Settlement.

Getting More Information

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.PierceCountyLibraryDataSettlement.com.

If you have additional questions, you may contact the Settlement Administrator by mail, email, or by calling toll-free.

Pierce County Library System Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799
info@PierceCountyLibraryDataSettlement.com
(833) 421-7302

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, 930 Tacoma Ave South Room 334 County-City Bldg. Tacoma, WA 98402.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING QUESTIONS ABOUT THIS SETTLEMENT.