



Circuit Court for Broward County, Florida

Allison Archer v. Pillsbury Winthrop Shaw Pittman LLP

Case No. CACE-26-011734

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

**IF YOU WERE NOTIFIED THAT YOUR PRIVATE INFORMATION MAY
HAVE BEEN COMPROMISED IN THE APRIL 2025
PILLSBURY WINTHROP SHAW PITTMAN LLP DATA INCIDENT,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR
RIGHTS AND ENTITLE YOU TO BENEFITS
AND A CASH PAYMENT.**

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 Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury” or “Defendant”) in a class action lawsuit. This case is related to the targeted cyberattack on Pillsbury’s computers that occurred in April 2025 (the “Data Incident”). Some files that contained private information were accessed. These files may have contained personal information such as names, dates of birth, addresses, Social Security numbers, drivers’ license numbers or other government-issued identification numbers, medical information, health insurance information, and financial account information.
- The lawsuit is called *Allison Archer v. Pillsbury Winthrop Shaw Pittman LLP*, Case No. CACE-26-011734. It is pending in the Circuit Court for Broward County, Florida (the “Action”).
- Pillsbury denies any wrongdoing, and the Court has not decided who is right.
- The Parties have agreed to settle the Action (the “Settlement”) to avoid the costs, risks, and uncertainties of continuing to litigate.
- Pillsbury’s records indicate that you are a Settlement Class Member and entitled to benefits under the Settlement. You may have received a previous notice directly from Pillsbury.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.PillsburyDataSettlement.com. 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 request a paper copy of the Claim Form.	December 7, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or payment. 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 may hire your own lawyer at your own expense.	December 7, 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 Hearing. If you object, you may also file a claim for Settlement Class Member Benefits.	December 7, 2026
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 or payments 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

- 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 Circuit Court for Broward County, Florida, 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 *Allison Archer v. Pillsbury Winthrop Shaw Pittman LLP*, Case No. CACE-26-011734. It is pending in the Circuit Court for Broward County, Florida. The people who filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Pillsbury Winthrop Shaw Pittman LLP, is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during the April 2025 targeted cyberattack on Pillsbury's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names, dates of birth, addresses, Social Security numbers, drivers' license numbers or other government-issued identification numbers, medical information, health insurance information, and financial account 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 "Settlement Class" or "Settlement Class Members." One court resolves the lawsuit for all Settlement Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representatives are Allison Archer, Martin Chaveria-Hernandez, and Frederico Reyes. Everyone eligible for benefits under the Settlement are the Settlement Class Members.

4. Why is there a Settlement?

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

Who Is Included in the Settlement?

5. Who is included in the Settlement?

The Court has defined the Settlement Class this way: “all living individuals residing in the United States who were provided notice that their Private Information may have been accessed in connection with the Data Incident.”

6. Are there exceptions?

Yes. Excluded from the Settlement Class are: (a) all persons who are partners, directors, officers, and agents of Defendant; (b) governmental entities; (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and (d) any Settlement Class Member who submits a timely and valid opt-out of the Settlement.

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

- Email: info@PillsburyDataSettlement.com
- Call toll free, 24/7: (844) 496-1265
- By mail: Pillsbury Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

Settlement Class Member Benefits

7. What does the Settlement provide?

Pillsbury will establish a Settlement Fund of \$2,340,000.00. The Settlement Fund will first be used to pay the costs of Settlement Administration and any Court-approved attorneys’ fees and costs, and any Service Awards approved by the Court. The remaining amount will be used to pay for the Settlement Class Member Benefits described below.

MEDICAL DATA MONITORING. All Settlement Class Members are eligible to enroll in one year of CyEx Medical Shield Complete. Enrollment codes have been sent to all Settlement Class Members by postcard and/or email. If you no longer have your enrollment code, please contact the Settlement Administrator.

This comprehensive service comes with \$1 million of medical identity theft insurance, and includes monitoring for:

- healthcare insurance identification number exposure
- medical record number exposure
- unauthorized health savings account spending

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH PAYMENT OPTIONS

Cash Payment for Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you may be reimbursed up to **\$3,000.00**. The losses must have occurred between April 29, 2025, and December 7, 2026.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your government-issued identification cards
- postage to contact banks by mail

You must send proof, like bank statements or receipts, to show how much you spent or lost. You may also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a Valid Claim. Your proof or notes should show that your expenses were because of the Data Incident.

You may not claim a payment for expenses that have already been reimbursed by a third party.

There is an aggregate cap of \$1,500,000.00 on this benefit. This means that if the total value of Valid Claims for Cash Payment for Documented Losses is over \$1,500,000.00, everyone's payments will be reduced *pro rata* so that they add up to \$1,500,000.00.

A full description of how this works is available in Settlement Agreement, at www.PillsburyDataSettlement.com.

Pro Rata Cash Payment. *In addition to* any Cash Payment for Documented Losses, you may claim a one-time Pro Rata Cash Payment.

It is expected that a significant amount of money will remain in the Settlement Fund after all expenses and all other benefits have been paid. The remaining money will be divided equally between everyone who claims a Valid Claim for a Pro Rata Cash Payment.

You do not have to provide any documentation or explanation to claim this payment.

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

- Email: info@PillsburyDataSettlement.com
- Call toll free, 24/7: (844) 496-1265
- By mail: Pillsbury Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against Pillsbury about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section XI) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.PillsburyDataSettlement.com.

How to Submit a Claim for Payment

9. How do I submit a Claim for a Settlement Class Member Benefit?

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

Pillsbury Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (844) 496-1265, by email info@PillsburyDataSettlement.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 **December 7, 2026**. If you are submitting a Claim by U.S. Mail, the completed and signed Claim Form, including any supporting documentation, must be postmarked no later than **December 7, 2026**.

11. When will the Settlement Class Member Benefits be issued?

The Court will hold a Final Approval Hearing on **December 22, 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 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 has appointed attorneys Jeff Ostrow of Kopelowitz Ostrow P.A. and Mariya Weekes of Milberg PLLC to represent you and other Settlement 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 one-third of the Settlement Value as reasonable attorneys' fees and reimbursement of litigation costs. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments will also be paid from the Settlement Fund.

How to Exclude 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 Settlement Class Member Benefits or payment. However, you will keep any rights you may have to sue Pillsbury 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 Class Member Benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **December 7, 2026**.

To be valid, your request for exclusion must have the following information:

- (1) the name of the Action: *Allison Archer v. Pillsbury Winthrop Shaw Pittman LLP*, Case No. CACE-26-011734, pending in the Circuit Court for Broward County, Florida;
- (2) your full name, current mailing address, telephone number, and email address;
- (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:

Pillsbury Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799-9958

Your request for exclusion must be postmarked by **December 7, 2026**.

How to Comment on or Object to the Settlement

16. 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 part or all of the Settlement, you may 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 Action: *Allison Archer v. Pillsbury Winthrop Shaw Pittman LLP*, Case No. CACE-26-011734, pending in the Circuit Court for Broward County, Florida;
- (2) the objector's full name, current mailing address, telephone number, and email address;
- (3) a detailed statement of all grounds for the objection, accompanied by any legal support for the objection known to the objector or the objector's counsel;
- (4) the number of times the objector has objected to a class action settlement during the five years preceding the filing of the objection, the caption of each case in which such objection was made, and copies of any orders addressing those objections;
- (5) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;
- (6) the number of times the objector's counsel or counsel's law firm has objected to a class action settlement during the five years preceding the filing of the objection, the caption of each such case, and copies of any orders addressing those objections;
- (7) whether the objector and/or objector's counsel will appear or testify at the Final Approval Hearing;
- (8) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (9) a statement confirming whether the objector and or the objector's counsel utilized any form of artificial intelligence in the preparation of the objection; and
- (10) the objector's signature (if you have hired your own lawyer, their signature is not sufficient).

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 **December 7, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and Defendant's Counsel.

Clerk of the Court	Settlement Administrator
Clerk of the Court 201 SE 6th Street Fort Lauderdale, FL 33301	Pillsbury Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Defendants' Counsel
Jeff Ostrow KOPELOWITZ OSTROW P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 Mariya Weekes MILBERG PLLC 333 SE 2nd Ave., Ste. 2000 Miami, FL 33131	Alfred J. Saikali SHOOK, HARDY & BACON L.L.P. 201 S. Biscayne Blvd., Ste. 3200 Miami, FL 33131

17. What is the difference between objecting and requesting exclusion?

Objecting is telling the Court that you do not like something about the Settlement. You may 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 may not 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 **December 22, 2026**, at **8:45 AM Eastern Time**, in Room #16-150 of the Circuit Court for Broward County, Florida, at 201 SE 6th Street, Fort Lauderdale, FL 33301.

You may join via Zoom at:

Zoom Link: <https://17thflcourts.zoom.us/j/109129436>

Meeting ID: 109 129 436

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 payments to the Class Representatives. The Court will also consider any objections to the Settlement.

If you are a Settlement 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.PillsburyDataSettlement.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.

What Happens if You 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**.

How to Get 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 www.PillsburyDataSettlement.com.

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

- Email: info@PillsburyDataSettlement.com
- Call toll free, 24/7: (844) 496-1265
- By mail: Pillsbury Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 201 SE 6th Street, Fort Lauderdale, FL 33301 or visiting the Court's website at <https://www.browardclerk.org/web2>.

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