

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Katie Pleasant, individually and on behalf of all others similarly situated v. Baker Drywall Partnership LLP d/b/a Baker Drywall

Case No. DC-24-08266

68th Judicial District Court of Dallas County, Texas

IF YOU ARE A PERSON IN THE UNITED STATES WHOSE PRIVATE INFORMATION WAS POTENTIALLY ACCESSIBLE AS A RESULT OF THE DATA INCIDENT, INCLUDING THOSE WHO WERE SENT NOTIFICATION FROM DEFENDANT THAT THEIR PRIVATE INFORMATION WAS POTENTIALLY ACCESSIBLE AS A RESULT OF THE DATA INCIDENT, YOU ARE ELIGIBLE TO RECEIVE A SETTLEMENT CLASS MEMBER BENEFIT FROM A CLASS ACTION

A state 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 Baker Drywall Partnership, LLC d/b/a Baker Drywall (“Baker” or “Defendant”), in a class action lawsuit concerning the cybersecurity incident that occurred on or about February 13, 2024. (“Settlement”).
- The lawsuit is captioned: *Katie Pleasant, individually and on behalf of all others similarly situated v. Baker Drywall Partnership LLP d/b/a Baker Drywall*, Case No. DC-24-08266, pending in the 68th Judicial District Court of Dallas County, Texas.
- Baker denies each and all of the claims and contentions alleged against it and denies all charges of wrongdoing or liability alleged (or which could be alleged) in the Litigation. Baker has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- You are included in the Settlement Class if you are a Settlement Class Member. A Settlement Class Member is an individual who was notified by or on behalf of Baker that their information was impacted by the cybersecurity incident that affected Baker in February 2024
- 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 FORM	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.BDDataSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Claims Administrator. You may also call or email the Claims Administrator to receive a paper copy of the Claim Form.	<u>October 21, 2025</u>
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.	<u>September 22, 2025</u>
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 benefits.	<u>September 22, 2025</u>
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

- These rights and options as a Settlement Class Member—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. Settlement Class Member Benefits will be made available only if the Court approves the Settlement and after any possible appeals are resolved.

WHAT THIS NOTICE CONTAINS

Click on a link below to jump to that Section:

[Basic Information](#)
[Who is in the Settlement](#)
[The Settlement Benefits](#)
[Submitting a Claim Form for Settlement Benefits](#)
[The Lawyers Representing You](#)
[Excluding Yourself from the Settlement](#)
[Commenting on or Objecting to the Settlement](#)
[The Court's Final Approval Hearing](#)
[If I Do Nothing](#)
[Getting More Information](#)

Basic Information

1. Why was this Notice issued?

The 68th Judicial District Court of Dallas County, Texas, authorized this Notice because 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 captioned: *Katie Pleasant, individually and on behalf of all others similarly situated v. Baker Drywall Partnership LLP d/b/a Baker Drywall*, Case No. DC-24-08266, pending in the 68th Judicial District Court of Dallas County, Texas. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the entity they sued is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges the private information of Plaintiff and other putative class members was potentially accessed or obtained as a result of a cybersecurity incident that occurred on or about February 13, 2024.

Defendant denies any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendant has done anything wrong.

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 “class members.” One court resolves the lawsuit for all class members, except for those who opt out of the settlement. In this Settlement, the named Plaintiff and Class Representative is Katie Pleasant, and everyone included in this Litigation are Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or the Defendant. Plaintiff and the Defendant 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 Plaintiff and Plaintiff’s attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals sent notice of the Data Incident by Defendant who reside in the United States.

6. Are there exceptions to being included?

Yes. (i) Baker and its officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) the Judge assigned to evaluate the fairness of this settlement; and (iv) any other Person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity pertaining to 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 Claims Administrator by mail, email, or by calling toll-free.

Baker Data Incident Settlement
c/o Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Info@BDDataSettlement.com
1-833-968-4109

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

The Settlement Benefits

7. What does the Settlement provide?

Baker has agreed to provide a number of benefits under the Settlement Agreement. You may file a claim for each benefit you are eligible for.

Identity Theft Protection Services. Settlement Class Members are eligible to claim one (1) year of identity theft protection services, which will include one credit bureau monitoring and \$1 million in identity theft insurance protections. No supporting documentation is necessary to receive this Settlement benefit.

Reimbursement for Ordinary Losses. Settlement Class Members are eligible to make a claim for ordinary out-of-pocket expenses (“Ordinary Losses”), not to exceed \$250 per Settlement Class Member, that were incurred as a result of the Data Incident. Ordinary Losses would include, without limitation and by way of example:

- (i) unreimbursed losses relating to fraud or identity theft;
- (ii) professional fees including attorneys’ fees, accountants’ fees, and fees for credit repair services;
- (iii) costs associated with freezing or unfreezing credit with any credit reporting agency;
- (iv) credit monitoring costs that were incurred on or after mailing of the notice of data breach, through the date of claim submission; and
- (v) miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

You must submit necessary supporting third party documentation, such as receipts, to verify the costs you incurred.

Lost Time Reimbursement. Settlement Class Members who have spent at least one hour of lost time as a result of the Data Incident are also eligible to receive reimbursement for up to three (3) hours of lost time spent dealing with the Data Incident (calculated at the rate of \$25 per hour and not to exceed \$75 per person). This benefit may be combined with Reimbursement for Ordinary Losses, subject to the \$250 cap per Settlement Class Member.

A claim for compensation for lost time must be supported by a written description of activities performed, and an attestation that the time claimed was reasonably related to responding to the effects of the Data Incident.

Reimbursement for Extraordinary Losses. Settlement Class Members are eligible to receive reimbursement for documented Extraordinary Losses, not to exceed \$5,000 per Settlement Class Member for documented monetary loss if:

- (i) The loss is an actual, documented, and unreimbursed monetary loss stemming from fraud or identity theft;
- (ii) the loss was more likely than not caused by the Data Breach;
- (iii) the loss was incurred after the date of the Data Breach;
- (iv) the loss is not already covered by one or more of the other reimbursement categories; and
- (v) 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.

To receive reimbursement for Extraordinary Losses, Settlement Class Members must submit necessary supporting third party documentation. Documentation supporting a claim for out-of-pocket expenses can include receipts or other documentation not “self-prepared” by the Settlement Class Member that documents the costs incurred. “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.

If you have questions about any of these benefits, or how to file a claim, you can contact the Claims Administrator by mail, email, or by calling toll-free.

Baker Data Incident Settlement
c/o Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Info@BDDataSettlement.com
1-833-968-4109

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

9. 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.BDDataSettlement.com.

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.BDDataSettlement.com. If you prefer, you can download the Claim Form from the website and mail it to the Claims Administrator at: Baker Data Incident Settlement, Attn: Claims, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

You may also contact the Claims Administrator to request a Claim Form by calling toll-free 1-833-968-4109, by emailing Info@BDDataSettlement.com, or by writing to 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 **October 21, 2025**. 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 **October 21, 2025**.

12. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 3, 2025, at 10:00am CT**. 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 Milberg Coleman Bryson Phillips Grossman, PLLC, to represent you and other Class Members (“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, costs and Litigation expenses in an amount not to exceed \$245,000. Also, Class Counsel will seek Court approval for a service award in the amount of \$1,500 to named Plaintiff. These fees and costs, as well as the costs of administration, will be paid by the Defendant.

Excluding Yourself from the Settlement

16. 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 **September 22, 2025**.

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

- the name of the Litigation: *Katie Pleasant, individually and on behalf of all others similarly situated v. Baker Drywall Partnership LLP d/b/a Baker Drywall*, Case No. DC-24-08266, pending in the 68th Judicial District Court of Dallas County, Texas;
- your full name;
- current address;
- personal signature; and
- the words "Request for Exclusion" or a clear and similar statement that you do not wish to participate in the Settlement.

Your request for exclusion must be mailed to the Claims Administrator at the address below, **postmarked no later than September 22, 2025**.

Baker Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 58220
Philadelphia, PA 19102

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.

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 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 considered by the Court, the objection must include:

- (i) the objector's full name, address, telephone number, and e-mail address (if any);
- (ii) information identifying the objector as a Settlement Class Member, including proof that the objector is a member of the Settlement Class (*e.g.*, copy of notice, copy of original notice of the Data Incident);
- (iii) a written statement of all grounds for the objection, accompanied by any legal support for the objection the objector believes applicable;
- (iv) the identity of any and all counsel representing the objector in connection with the objection;
- (v) a statement as to whether the objector and/or his or her counsel will appear at the Final Fairness Hearing; and
- (vi) the objector's signature and, if applicable, the signature of the objector's duly authorized attorney or other duly authorized representative.

To be timely, written notice of an objection in the appropriate form must be mailed and postmarked to the Claims Administrator no later than **September 22, 2025**.

Baker Data Incident Settlement
ATTN: Objection
P.O. Box 58220
Philadelphia, PA 19102

Any Settlement Class Member who fails to comply with the requirements for objecting shall waive and forfeit any and all rights he or she may have to appear separately and/or to object to the Settlement Agreement, and the Settlement Class Member shall be bound by all the terms of the Settlement Agreement and by all proceedings, orders, and any Judgment 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 3, 2025**, at **10:00am** Central Time, via Zoom. .

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 to the Class Representative who brought this Litigation on behalf of the Settlement Class. The Court will also consider any objections to the Settlement.

If you are a Settlement 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.BDDataSettlement.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 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. 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.BDDataSettlement.com.

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

Baker Data Incident Settlement
c/o Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Info@BDDataSettlement.com
1-833-968-4109

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

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, George L. Allen, Sr. Courts, Building, 600 Commerce St, Dallas, TX 75202. .

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