

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Circuit Court of Cook County, Illinois, County Department, Chancery Division
Redman, et al. v. Illinois Bone and Joint Institute LLC, Case No. 2024-CH-08333

Were you notified that your Personal Information may have been compromised in a Data Incident that Illinois Bone and Joint Institute, LLC discovered in or around July 4, 2024? A proposed class action settlement may affect your rights.

A Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Illinois Bone and Joint Institute, LLC, (“IBJI” or “Defendant”), in a class action lawsuit about a data security incident affecting IBJI that was discovered on or around July 4, 2024 and may have resulted in unauthorized access to people’s Personal Information, (the “Data Incident”).
- You are included in this Settlement as a Settlement Class Member if you received a Breach Notice from the Defendant notifying you that your Personal Information (i.e. information that identifies an individual or that in combination with other information can be used to identify, locate, or contact an individual) was potentially compromised in the Data Incident and/or Notice from the Settlement Administrator identifying you as a Settlement Class Member.
- As a Settlement Class Member, your rights are affected whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive cash and other benefits from this Settlement is by submitting a timely, valid, and Approved Claim. You can submit your Claim Form online at www.IBJISettlement.com or mail it to the Settlement Administrator. You may also call the Settlement Administrator to receive a paper copy of the Claim Form.	July 1, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement. 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 elect to retain your own legal counsel at your own expense. If you opt-out, you will not be able to receive any benefits and you will be bound by the terms of the Settlement Agreement.	June 1, 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.	June 1, 2026
DO NOTHING	If you do nothing, you will not receive any 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—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?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this Action and about all of your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is captioned *Redman, et al. v. Illinois Bone and Joint Institute LLC*, Case No. 2024-CH-08333 and is pending in the Circuit Court of Cook County Illinois Court Department, Chancery Division. The people who filed this Action are called the Plaintiffs and the company they sued, Illinois Bone and Joint Institute, LLC, is called the Defendant.

2. What is this Action about?

This Action alleges that Personal Information (i.e. information that identifies an individual or that can be combined with other information to identify, locate, or contact an individual) was compromised in the Data Incident that Illinois Bone and Joint Institute LLC discovered on or around July 4, 2024.

Defendant denies all of Plaintiffs' claims and maintain that it did not do 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 who sue are known as "Class Representatives" or "Plaintiffs." 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 exclude themselves (sometimes called, "opting out") from a settlement. In this Settlement, the Class Representatives are Guy Redman, Bryan Wasserman, Gerard Ablin, Linda Kogen, Gary Kiefel, David Schultz, Jeff Fischer, Marianne Ajani, and Brian Holovaty.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendant. The Defendant denies all claims and contends that it has not violated any laws. Plaintiffs and the Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim a payment and other benefits. Plaintiffs and their attorneys, who also represent Settlement Class Members, 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 residing in the United States who received a Breach Notice stating that their Personal Information was potentially compromised in the Data Incident discovered by IBI in July 2024, including all those individuals who received notice of the Data Incident. The Settlement Class consists of approximately 568,000 individuals.

6. Are there exceptions to being included in the Settlement?

Yes, excluded from the Settlement Class are: (1) the judges presiding over this Action, and members of their direct families; (2) Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which Defendant or its parents have a controlling interest; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

THE SETTLEMENT CLASS MEMBER BENEFITS

7. What can I get from this Settlement?

If approved by the Court, Defendant will pay \$4,000,000 in a Settlement Fund to resolve the Settlement.

Settlement Class Members may elect to receive one or more of the following benefits:

- (1) **Pro Rata Cash Payment:** An estimated \$50 cash payment, subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims received;
- (2) **Reimbursement of Out-Of-Pocket Losses:** Reimbursement of up to \$5,000 in documented losses related to the Data Incident; and
- (3) **Medical Monitoring:** Two (2) years of Kroll Medical Monitoring.

In addition, to the benefits above, the Defendant has made certain changes to its information security.

8. Tell me more about Reimbursement of Out-of-Pocket-Losses.

Settlement Class Members may submit a Claim for up to \$5,000 for reimbursement of Out-of-Pocket Losses. “Out-of-Pocket Losses” are unreimbursed costs or expenditures incurred by a Settlement Class Member that are fairly traceable to the Data Incident including, without limitation, the following: (i) unreimbursed costs, expenses, losses or charges incurred as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of class member’s personal information; (ii) costs incurred on or after May 30, 2024, associated with purchasing or extending additional credit monitoring or identity theft protection services and/or accessing or freezing/unfreezing credit reports with any credit reporting agency; and (iii) other miscellaneous expenses incurred related to any Out-of-Pocket Loss such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

9. Tell me more about Medical Monitoring.

Settlement Class Members may submit a Claim to receive two (2) years of Kroll Medical Monitoring, which provides ongoing single-bureau credit monitoring; dark web and medical identity scanning with real-time alerts; Social Security number and payday loan monitoring; unlimited access to fraud specialists; identity theft restoration services; and up to \$1,000,000 in identity fraud loss reimbursement with no deductible. Medical Monitoring Codes will be active for 180 days after the date they are emailed and/or mailed to Settlement Class Members and may be used to activate the full term if used at any time during that 180-day period. The Medical Monitoring product being offered has an estimated value of \$240 per year per Settlement Class Member.

10. 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 in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.IBJISettlement.com.

HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS – MAKING A CLAIM

11. How do I submit a Claim Form and get Settlement Class Member Benefits?

You must submit a Claim Form by **July 1, 2026**. Claim Forms may be submitted online at www.IBJISettlement.com by 11:59 p.m. CT, or mailed postmarked by **July 1, 2026** to the Settlement Administrator at *Settlement Administrator – 83381*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.

12. When will I get my Settlement Class Member Benefits?

The short answer is – after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **July 1, 2026, at 10:30 a.m. CT**, to decide whether to approve the Settlement, how much attorneys’ fees, costs and expenses to award Class Counsel for representing the Settlement Class, and Service Award payments to the Class Representative who brought this Action on behalf of the Settlement Class.

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 Class Member Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes, the Court appointed Ben Barnow of Barnow and Associates P.C., Raina C. Borrelli of Strauss Borrelli PLLC, and Gary M. Klinger of Milberg PLLC, to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund, (subject to Court approval).

If you want to be represented by your own lawyer, you may hire one at your own expense.

14. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys’ fees up to 35% of the Settlement Fund (\$1,400,000) plus reimbursement of reasonable litigation costs and expenses, and \$2,000 Service Award payments to each of the Class Representatives. If approved, these amounts will be paid from the Settlement Fund before making payments to Settlement Class Members who submit Valid Claims.

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 to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out” of the Settlement Class. The Opt-Out Deadline to submit a request for exclusion from the Settlement is **June 1, 2026**.

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

- at the top of the letter — the words “Request for Exclusion” or a comparable statement indicating that you do not wish to participate in the Settlement such as “I wish to be excluded from the Settlement Class”;
- the name of the proceeding (“*Redman, et al. v. Illinois Bone and Joint Institute LLC*”, Case No. 2024-CH-08333”);
- your full name and current address;

- your personal signature.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **June 1, 2026**.

Settlement Administrator – 83381
c/o Kroll Settlement Administration LLC
ATTN: Exclusion Request
PO Box 225391
New York, NY 10150-5391

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for attorneys' fees, costs and expenses or Service Award payments, the Releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include:

- a. the name of the proceeding (“*Redman, et al. v. Illinois Bone and Joint Institute LLC*, Case No. 2024-CH-08333”);
- b. your full name, current mailing address, and telephone number;
- c. a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection;
- d. a statement as to whether the objection applies only to you, to a specific subset of the class, or to the entire class;
- e. the identity of any attorney(s) representing you;
- f. a statement regarding whether your or your attorney intends to appear at the Final Approval Hearing;
- g. a list of all other matters in which you or your attorney has lodged an objection to a class action settlement; and
- h. your signature (or electronic equivalent) or your attorney's signature.

Objections must be mailed to the Settlement Administrator at the addresses below, postmarked no later than **June 1, 2026**.

Settlement Administrator – 83381
c/o Kroll Settlement Administration LLC
ATTN: OBJECTIONS
PO Box 225391
New York, NY 10150-5391

18. What is the difference between objecting and opting out?

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 it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself/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 is scheduled to hold a Final Approval Hearing on **July 1, 2026 at 10:30 a.m. CT**, before Judge William B. Sullivan, Courtroom 2410, Richard J. Daley Center, 50 W. Washington Street, Chicago, Illinois 60602, via Zoom (Meeting ID: 955 3557 3920; no password required) to decide whether to approve the Settlement, how much attorneys' fees, costs, and expenses to award to Class Counsel for representing the Settlement Class, and whether to award Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.IBJSettlement.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 file an objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

21. 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, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases of the Released Parties in the Settlement and not be eligible to receive any Settlement Class Member Benefits.

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.IBJSettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone, or by mail:

Toll-Free: (833) 447-8441

Mail: *Redman, et al. v. Illinois Bone and Joint Institute LLC*, c/o Kroll Settlement Administration LLC, PO Box 255391, New York, NY 10150-5391.

PLEASE DO NOT CONTACT THE COURT OR DEFENDANT.