

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Salazar et al. v. Thompson Coburn LLP*  
Case No. 2622-CC00320  
Circuit Court of the City of St. Louis, Missouri

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE MAY 2024 THOMPSON COBURN 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 Thompson Coburn LLP (“Thompson Coburn” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on Thompson Coburn's computer systems that occurred in May 2024 (the “Data Incident”). Certain files were accessed that may have contained personal information such as name; date of birth; protected health information; health insurance information; prescription/treatment information; clinical information; medical provider information; passport number; drivers’ license information; and Social Security number.
- The lawsuit is called *Salazar et al. v. Thompson Coburn LLP*, Case No. 2622-CC00320 It is pending in the Circuit Court of the City of St. Louis, Missouri (the “Action”).
- Thompson Coburn denies that it did anything wrong, and the Court has not decided in favor of any party.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Action.
- 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              |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| <b>SUBMIT A CLAIM</b>                                       | <p>The only way to receive cash payments from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <b>www.TCDataSettlement.com</b>. 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 receive a paper copy of the Claim Form.</p>                                                                                                            | <b>July 23, 2026</b>  |
| <b>OPT OUT OF THE SETTLEMENT</b>                            | 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 can hire your own lawyer at your own expense.                                                                                                                                                                                                                                                          | <b>August 7, 2026</b> |
| <b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>     | 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.                                                                                                                                                                                                                                                | <b>August 7, 2026</b> |
| <b>DO NOTHING</b>                                           | <p>Unless you opt out of the Settlement, you are automatically part of the Settlement.</p> <p><b>Medical Data Monitoring.</b> Settlement Class Members were mailed enrollment codes for Medical Data Monitoring; activation instructions will be sent after the Settlement has received final approval. You do not need to file a claim or do anything further to receive this benefit other than activate your enrollment after the Settlement is finally approved.</p> <p><b>Cash Payments.</b> You must file a claim to receive a cash payment.</p> | No Deadline           |

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this Action still has to decide whether to approve the Settlement.

## WHAT THIS NOTICE CONTAINS

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## Basic Information

### 1. Why was this Notice issued?

The Circuit Court of the City of St. Louis, Missouri, 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 *Salazar et al. v. Thompson Coburn LLP*, Case No. 2622-CC00320. It is pending in the Circuit Court of the City of St. Louis, Missouri. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Thompson Coburn LLP, is called the “Defendant.”

### 2. What is this lawsuit about?

This lawsuit alleges that during the May 2024 targeted cyberattack on Thompson Coburn's computer systems, certain files were accessed or stolen that may have contained personal information such as name; date of birth; protected health information; health insurance information; prescription/treatment information; clinical information; medical provider information; passport number; drivers’ license information; and Social Security number.

### 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 of the settlement. In this Settlement, the Class Representatives are Jason Salazar; Kristin Tafoya; Denise Sandoval Duran; Heidi Mathiasen; Paula Ortiz; M.R.; D.L. through their next friend Johnny Madrid; Kristen Cochrane; Mary Martinez; and Mikah Wuorinen.

### 4. Why is there a Settlement?

The Court did not decide in favor of either the Plaintiffs or the Defendant. 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 persons in the United States who were sent notice of the Data Incident as identified in the Class List.” The Class List is a list of Settlement Class Members compiled by Thompson Coburn.

### 6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) Defendant, its general counsel, and all members of its management committee; and (2) the Judge assigned to the Action, the Judge’s immediate family, and Court staff; and (3) any individual who timely and validly opts 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@TCDataSettlement.com](mailto:info@TCDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6541
- By mail: Thompson Coburn 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.TCDataSettlement.com](http://www.TCDataSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

Thompson Coburn will establish a Common Settlement Fund of \$6,000,000. The Common Settlement Fund will first be used to pay court-approved attorneys’ fees and costs, Service Award payments for the Class Representatives, and the costs of administering the Settlement. The net remaining money will be used to pay for Cash Payment B – *Pro Rata* Cash Payment described below.

In addition to the Common Settlement Fund, Thompson Coburn will also make available certain Additional Benefits. The Additional Benefits are payments for Settlement Class Members’ timely and valid claims for Cash Payment A – Documented Losses described below; payment in the amount set forth in the Cyex agreement dated January 27, 2026 to make Medical Data Monitoring available to all Settlement Class Members; and payment of up to \$250,000 in attorneys’ fees. The total amount of Additional Benefits is capped at \$1,500,000.

**MEDICAL DATA MONITORING.** Following the Effective Date, all Settlement Class Members are eligible to enroll in three years of CyEx Medical Shield Total, and were mailed their enrollment codes. This comprehensive service comes with \$1,000,000 of medical identity theft insurance, and includes monitoring for:

- healthcare insurance ID exposure
- Medical Record Number (MRN) exposure
- unauthorized Health Savings Account (HSA) spending

## CASH PAYMENTS

**Cash Payment A – Documented Losses.** If you incurred documented, unreimbursed out-of-pocket losses due to the Data Incident, you may be reimbursed up to **\$5,000**. The losses must have occurred between May 28, 2024, and **July 23, 2026**.

This benefit covers out-of-pocket expenses due to the Data Incident like:

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

You need to send proof, like bank statements or receipts, to show how much you spent or lost. You can 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 must show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed.

Cash Payment A – Documented Losses is an Additional Benefit and is not paid from the Common Settlement Fund. This means that the amount paid for timely and valid claims for this benefit will depend on, among other things, the total amount of claims, and it may be subject to a pro rata reduction.

**Cash Payment B – Pro Rata Cash Payment.** *Instead of Cash Payment A*, you may claim a one-time cash payment. Everyone who files a valid and timely claim for this payment will receive an equal share of the Common Settlement Fund after the Settlement Administrator pays court-approved attorneys' fees and costs, Service Award payments for the Class Representatives, and the costs of administering the Settlement.

You do not have to provide any proof or explanation to claim this payment. Please see the following FAQ describing the estimated amount of this cash payment.

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

- Email: [info@TCDataSettlement.com](mailto:info@TCDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6541
- By mail: Thompson Coburn Data Incident Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

## 8. What is the Amount of the Cash Payments?

As described above, there are two cash payment benefits.

The amount of the Cash Payment B – *Pro Rata* Cash Payment will depend upon the amount awarded by the Court for attorneys' fees and costs, and Service Awards to Class Representatives. It will also depend upon

the cost of Settlement Administration as well as the total number of claims submitted for this benefit. As a result, it is **not** possible to know with certainty, but we estimate the payment will be approximately \$150—but it could be **higher or lower**.

The amount of the payments for Cash Payment A – Document Losses will depend on the cost of Medical Data Monitoring, the amount of attorneys’ fees awarded by the Court, and the total number of claims submitted for this benefit. As a result, a valid claim for this cash payment may be reduced on a pro rata basis.

## 9. What am I giving up if I stay in the Class?

If you stay in the class, you won’t be able to be part of any other lawsuit against the Thompson Coburn Persons or any other Released Parties about the issues that this Settlement covers.

“Thompson Coburn Persons” means Defendant, and its current and former shareholders, partners, associates, attorneys, of counsel attorneys, in-house attorneys, officers, employees, directors, divisions, and affiliated companies.

“Released Parties” means:

- (a) All Thompson Coburn Persons, as well as the Thompson Coburn Persons’ respective predecessors, successors, assigns, current and former parents, subsidiaries, divisions, and affiliated companies, whether indirect or direct, as well as their directors, officers, members, managers, employees, agents, vendors, insurers, reinsurers, sureties, shareholders, attorneys, advisors, consultants, representatives, partners, joint venturers, contractors, wholesalers, resellers, distributors, service providers, and retailers; and
- (b) Entities and persons, including but not limited to Presbyterian Health Services and the Thompson Coburn Persons’ current and former clients, whose information, including but not limited to information contained in files relating to representation of such current and former clients, was compromised, accessed, exfiltrated, or otherwise impacted by the Data Incident, as well as those Entities’ and persons’ respective predecessors, successors, assigns, current and former parents, subsidiaries, divisions, and affiliated companies, whether indirect or direct, as well as their directors, officers, members, managers, employees, agents, vendors, insurers, reinsurers, sureties, shareholders, attorneys, advisors, consultants, representatives, partners, joint venturers, contractors, wholesalers, resellers, distributors, service providers, and retailers. For the avoidance of doubt, the Released Parties also include the business associates and/or covered entities who were the data owners of information accessed, compromised, or impacted by the Data Incident. It is the Parties’ express intent that all Entities and persons that are Released Parties are third party beneficiaries who the Parties intend should benefit from the Settlement Agreement and who are entitled to enforce the Settlement Agreement fully and directly, including without limitation the Settlement Agreement’s releases.

Please see the Settlement for additional information describing the legal claims you are giving up if you remain in the Settlement Class, including the “Releases” section of the Settlement (Section XIII). The Settlement is available at **[www.TCDataSettlement.com](http://www.TCDataSettlement.com)**.

## **Submitting a Claim Form for a Settlement Payment**

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

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

Thompson Coburn 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, **1- (833) 386-6541**, by email **info@TCDataSettlement.com**, or by U.S. mail at the address above.

### **11. Are there any important Settlement payment deadlines?**

Yes. If you are submitting a Claim Form online, you must do so by **July 23, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **July 23, 2026**.

### **12. When will the Settlement benefits be issued?**

The Court will hold a final approval hearing on **August 27, 2026 @ 1:30pm (see Question 18)**. If the Court approves the Settlement there may still be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time. Please be patient.

## **The Lawyers Representing You**

### **13. Do I have a lawyer in the case?**

Yes, the Court has appointed attorneys Raina Borrelli of Strauss Borrelli PLLC; Norman E. Siegel of Stueve Siegel Hanson LLP; and Jeff Ostrow of Kopelowitz Ostrow P.A., to represent you and other Settlement Class Members ("Class Counsel").

### **14. 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.

### **15. How will Class Counsel be paid?**

Class Counsel will ask the Court to approve up to \$2,500,000 as reasonable attorneys' fees, plus the costs of litigation. Up to \$2,250,000 of attorneys' fees plus all costs of litigation will be paid from the Common Settlement Fund, and up to \$250,000 in attorneys' fees will be paid by Thompson Coburn.

Class Counsel will also ask for Service Award payments of \$2,500 for each of the Class Representatives. Service Award payments will also be paid from the Common Settlement Fund.

## Excluding Yourself from the Settlement

### 16. 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 sometimes also called “opting out.” If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue Thompson Coburn Persons and other Released Parties 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 benefits if you exclude yourself.

The deadline to opt out of the Settlement is **August 7, 2026**.

To be valid, your request to opt out must have the following information:

- (1) the name of the Action: *Salazar et al. v. Thompson Coburn LLP*, Case No. 2622-CC00320, pending in the Circuit Court of the City of St. Louis, Missouri;
- (2) your full name and mailing address;
- (3) personal signature; and
- (4) a clear statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your request to opt out to the Settlement Administrator at:

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

Your request to opt out must be postmarked by **August 7, 2026**.

Please see the Settlement for additional information.

## 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 part or all of the Settlement, you can 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 16**).

You must provide the following information for the Court to consider your objection:

- (1) the name of the Action: *Salazar et al. v. Thompson Coburn LLP*, Case No. 2622-CC00320, pending in the Circuit Court of the City of St. Louis, Missouri;

- (2) your full name, mailing address, telephone number, and email address;
- (3) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (4) the number of times you have objected to a class action settlement within the five years preceding the date that you submit the objection, the caption of each case in which you have made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- (5) the identity of all counsel who represent you, 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, and whether they will appear at the Final Approval Hearing;
- (6) the number of times in which your counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection, and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- (7) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (8) a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- (9) your signature (an attorney's 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 **either**: (a) electronically file your objection in the Action's electronic docket on or before the Objection Deadline; or (b) send your objection via first class, postage-prepaid United States Mail, postmarked no later than the Objection Deadline, to: (i) the Clerk of Court; (ii) Class Counsel; and (ii) Defendant's Counsel at the addresses below:

| <b>Clerk of the Court</b>                                                                                            | <b>Settlement Administrator</b>                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Clerk of the Court<br><b>Circuit Court of the City of St. Louis, MO</b><br>10 N. Tucker Blvd.<br>St. Louis, MO 63101 | Thompson Coburn Data Incident Settlement<br><b>ATTN: Objections</b><br>P.O. Box 25226<br>Santa Ana, CA 92799-9958                           |
| <b>Class Counsel</b>                                                                                                 | <b>Defendant's Counsel</b>                                                                                                                  |
| Raina Borrelli<br><b>Strauss Borrelli PLLC</b><br>980 N. Michigan Ave., Ste. 1610<br>Chicago, Illinois 60611         | Kristine McAlister Brown<br>Donald Houser<br><b>Alston &amp; Bird LLP</b><br>1201 West Peachtree Street, Ste 4900<br>Atlanta, Georgia 30309 |

|                                                                                                                                                                                                                                                           |                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Norman Siegel<br/> <b>Stueve Siegel Hanson LLP</b><br/> 460 Nichols Road, Ste. 200<br/> Kansas City, Missouri 64112</p> <p>Jeff Ostrow<br/> <b>Kopelowitz Ostrow P.A.</b><br/> 1 West Las Olas Blvd., Ste. 500<br/> Fort Lauderdale, Florida 33301</p> | <p>Robb E. Hellwig<br/> <b>Stone, Leyton &amp; Gershman,<br/> a Professional Corporation</b><br/> 7733 Forsyth Blvd., Suite 500<br/> St. Louis, Missouri 63105</p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 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 the Settlement. Opting out of the Settlement is 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 on **August 27, 2026 @ 1:30pm Central Time**, in the Circuit Court of the City of St. Louis, Missouri, at 10 N. Tucker Blvd., St. Louis, MO 63101.

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.

The date and time of this hearing may change without further notice. Please check **[www.TCDataSettlement.com](http://www.TCDataSettlement.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, 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.

## If I Do Nothing

### 21. What happens if I do nothing at all?

If you do nothing, you will not receive a payment from this Settlement, though you may still enroll in three years of Medical Data Monitoring.

You will also give up the rights described in **Question 8**.

## Getting More Information

### 22. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement and other related documents are available at the Settlement Website, **[www.TCDataSettlement.com](http://www.TCDataSettlement.com)**.

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

- Email: [info@TCDataSettlement.com](mailto:info@TCDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6541
- By mail: Thompson Coburn 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, Circuit Court of the City of St. Louis, Missouri, at 10 N. Tucker Blvd., St. Louis, MO 63101.

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