

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If University of St. Thomas (“UST”) Notified You of a Data Incident, You May be Eligible For Benefits From a Class Action Settlement.

This is not a solicitation from a lawyer, junk mail, or an advertisement. A court authorized this Notice.

- A proposed Settlement has been reached in a class action lawsuit known as *Amy Crull v. University of St. Thomas*, Cause No. 2025-83309, (“Lawsuit”), pending in the 11th Judicial District Court of Harris County, Texas.
- This Lawsuit arises out of unauthorized access to the University of St. Thomas network and certain files containing personal information including credit card, bank account, and Social Security Numbers, passports and licenses, logins and passwords to work-related accounts, home addresses, email addresses, phone numbers, donor contact information, club membership information, and other documents of a confidential and sensitive nature (collectively “Private Information”), which occurred between July 25, 2025 and August 12, 2025 (the “Data Incident”). UST disagrees with and disputes Plaintiff’s claims and denies any and all wrongdoing.
- All Settlement Class Members can receive the following benefits from the Settlement: (i) reimbursement for up to \$500 for ordinary losses, up to \$4,500 for extraordinary losses, and up to \$100 for losses related to Sensitive Personal Information with supporting documentation; (ii) the ability to claim three (3) years of credit monitoring and identity theft protection services with one (1) bureau; (iii) in lieu of submitting a claim for documented out-of-pocket losses or credit monitoring, Settlement Class Members may submit a claim for an alternative cash payment of \$50; and (iv) UST also agrees to implement and/or maintain various security related improvements.
- You are included in this Settlement as a Settlement Class Member if you reside in the United States and were mailed a Notice Letter by UST that your Personal Information was potentially compromised as a result of the Data Incident which occurred between July 25, 2025 and August 12, 2025.
- Your legal rights are affected regardless of whether you do or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT

Submit a Claim	You must submit a Valid Claim to get benefits from this Settlement. Claim Forms must be submitted online by www.USTDataSettlement.com or, if mailed, postmarked no later than September 28, 2026 .
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue Defendant or the Released Persons about the Released Claims resolved by this Lawsuit, and you will not get any benefits from this Settlement.
Exclude Yourself	Get out of the Settlement. Get no Settlement benefits. Keep your rights. This is the only option that allows you to keep your right to sue the Defendant or the Released Persons about the Released Claims resolved in this lawsuit. You will not get any benefits from the Settlement. Your request to exclude yourself must be postmarked no later than August 28, 2026 .
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. You may also ask the Court for permission to speak about your objection at the Final Fairness Hearing. If you object, you may also file a claim for Settlement benefits. Objections must be postmarked no later than August 28, 2026 .
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details.

	The Final Fairness Hearing date will be posted on the Settlement Website at www.USTDataSettlement.com once it is scheduled. Please check the website for the most current information and updates.
--	---

WHAT THIS NOTICE CONTAINS

Basic Information..... Pages 3-4

1. How do I know if I am affected by the lawsuit and Settlement?
2. What is this case about?
3. Why is there a Settlement?
4. Why is this a class action?
5. How do I know if I am included in the Settlement?

The Settlement Benefits..... Pages 4-5

6. What does this Settlement provide?
7. How to submit a Claim?
8. What am I giving up as part of the Settlement?
9. Will the Class Representative receive compensation?

Exclude Yourself..... Page 6

10. How do I exclude myself from the Settlement?
11. If I do not exclude myself, can I sue later?
12. What happens if I do nothing at all?

The Lawyers Representing You Page 6

13. Do I have a lawyer in the case?
14. How will the lawyers be paid?

Objecting to the Settlement..... Page 7

15. How do I tell the Court that I do not like the Settlement?
16. What is the difference between objecting and asking to be excluded?

The Final Fairness Hearing..... Page 8

17. When and where will the Court decide whether to approve the Settlement?
18. Do I have to come to the hearing?
19. May I speak at the hearing?

Do Nothing..... Page 8

20. What happens if I do nothing?

Get More Information Page 8

21. How do I get more information about the Settlement?

BASIC INFORMATION

1. How do I know if I am affected by the Lawsuit and Settlement?

You are a Settlement Class Member if you reside in the United States and were mailed a Notice Letter by UST that your Personal Information was potentially compromised as a result of the Data Incident which occurred between July 25, 2025 and August 12, 2025. Settlement Class Members will receive a postcard Notice of the Settlement that includes their Login ID Number.

The Settlement Class specifically excludes: (i) the University of St. Thomas (“UST”), any Related Entities, and their officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; 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 occurrence of the Data Incident or who pleads *nolo contendere* to any such charge. This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

2. What is this case about?

This case is known as *Amy Crull v. University of St. Thomas*, Cause No. 2025-83309, filed in the 11th Judicial District Court of Harris County, Texas. The person who sued is called the “Plaintiff” and the university they sued, UST, is known as the “Defendant” in this case. UST will be called “Defendant” in this Notice.

Plaintiff filed a lawsuit against Defendant, individually, and on behalf of anyone whose Private Information was potentially compromised as a result of the Data Incident.

This Lawsuit arises out of unauthorized access to the University of St. Thomas (“UST”) network and certain files containing personal information including credit card, bank account and Social Security Numbers, passports and licenses, logins and passwords to work-related accounts, home addresses, email addresses, phone numbers, donor contact information, club membership information, and other documents of a confidential and sensitive nature (collectively “Private Information”), which occurred between July 25, 2025 and August 12, 2025 (the “Data Incident”). UST firmly disagrees with Plaintiff’s claims and denies any wrongdoing.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representatives, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class Members. The Court did not decide in favor of the Plaintiff or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at www.USTDataSettlement.com.

4. Why is this a class action?

In a class action, one or more people called a “Class Representative” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.” Here, Plaintiff and Class Representative is Amy Crull who sued on behalf of herself and all Settlement Class Members.

5. How do I know if I am included in the Settlement?

You are included in the Settlement if you reside in the United States and were mailed a Notice Letter by UST that your Personal Information was potentially compromised as a result of the Data Incident which occurred between July 25, 2025 and August 12, 2025. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.USTDataSettlement.com, call toll free (833) 421-7269, or write to UST Data Settlement, P.O. Box 25226, Santa Ana, CA 92799.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

Documented Out of Pocket Expense Reimbursement: All Settlement Class Members may submit a claim for unreimbursed out-of-pocket expenses fairly traceable to the Data Incident upon submission of a claim form and supporting documentation for out-of-pocket costs or expenditures that a class member actually incurred between July 25, 2025 and **September 28, 2026** and which has not already been reimbursed by a third party or other source, as follows:

(i) Ordinary Losses: Up to \$500 per person with third-party documentation. Ordinary losses would include, without limitation and by way of example: professional fees including attorneys' fees, accountants' fees, and fees for credit repair services; costs associated with freezing or unfreezing credit with any credit reporting agency; credit monitoring costs that were incurred between July 25, 2025 and **September 28, 2026**; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

(ii) Extraordinary Losses: Up to \$4,500 per person with third-party documentation, if: (i) the loss is an actual, documented, and unreimbursed monetary loss stemming from fraud or identity theft; (ii) the loss from fraud or identity theft was more likely than not caused by the Data Incident; (iii) the loss from fraud or identity theft was incurred after the date of the Data Incident; (iv) the loss from fraud or identity theft 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.

(iii) Losses Related to Sensitive Personal Information: All Settlement Class Members who experienced a disclosure of their Sensitive Personal Information¹ can claim a \$100 cash payment upon submission of third-party documentation (not self-prepared) supporting the assertion that such a disclosure was more likely than not caused by the Data Incident.

Settlement Class Members with Documented Out-of-Pocket Losses must submit plausible documentation supporting their claims. This can include receipts or other documentation not "self-prepared" by the claimant that documents the costs incurred. "Self-prepared" documents such as handwritten receipts are, by themselves, insufficient, but can be considered to add clarity or support other submitted documentation. To receive reimbursement for any of the above-referenced out-of-pocket expenses, Settlement Class Members must submit a valid and timely claim, including necessary supporting documentation, to the Claims Administrator. Settlement Class Members must also have made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring

¹ Sensitive Personal Information includes employment files and records, reports of professional or criminal misconduct, settlement agreements or other information related to legal proceedings, and disciplinary records.

insurance and identity theft insurance.

Credit Monitoring: Settlement Class Members can also elect to enroll in three (3) years of one-bureau credit monitoring and identity theft protection services with at least \$1,000,000 in identity theft insurance. Settlement Class Members who wish to claim credit monitoring must do so by the Claims Deadline on **September 28, 2026** by selecting the credit monitoring option on the Claim Form.

Alternative Cash Payment: In lieu of submitting a claim for documented out-of-pocket expense reimbursement or credit monitoring, Settlement Class Members may submit a claim for an alternative cash payment of \$50.

Information Security Improvements: UST will implement and keep in place various security-related improvements for a period of one (1) year after final approval of the Settlement. Costs associated with these security improvements will be paid by UST separate and apart from other Settlement benefits.

7. How to submit a claim?

All claims will be reviewed by the Claims Administrator and/or a claims referee. You must file a Claim Form to get any benefits from the proposed Settlement. Claim Forms must be submitted online by **September 28, 2026** or postmarked no later than **September 28, 2026**. You can download a Claim Form at www.USTDataSettlement.com or you can call the Claims Administrator at (833) 421-7269.

8. What am I giving up as part of the Settlement?

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue UST and its Related Entities and each of their past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of their respective predecessors, successors, directors, officers, principals, agents, attorneys, insurers, and reinsurers regarding the Released Claims in this case. The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Persons, is available at www.USTDataSettlement.com.

The only way to keep the right to sue is to exclude yourself (*see* Question 10), otherwise you will be included in the Settlement Class, if the Settlement is approved, and you give up the right to sue for the Released Claims this Settlement resolves.

9. Will the Class Representative receive compensation?

Yes. The Class Representative will request a service award of up to \$4,000 to compensate them for their service and efforts in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Class Representative.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must send a timely written request for exclusion. Your request for exclusion must: (i) state the Settlement Class Member's full name, current mailing address, and signature; and (ii) clearly manifest a Person's intent to be excluded from the Settlement Class.

Your written request for exclusion must be postmarked no later than **August 28, 2026** to:

Claims Administrator
UST Data Settlement

ATTN: Exclusion Request

P.O. Box 25226

Santa Ana, CA 92799

Instructions on how to submit a request for exclusion are available at www.USTDataSettlement.com or from the Claims Administrator by calling (833) 421-7269.

If you exclude yourself, you will not be able to receive any benefits from the Settlement and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit and you will keep your right to sue the Defendant or the Released Persons on your own for the Released Claims that this Settlement resolves.

11. If I do not exclude myself, can I sue later?

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Defendant or the Released Persons (listed in Question 8) for the Released Claims this Settlement resolves.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any benefits from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Defendant or Released Persons (listed in Question 8) about the Released Claims this Settlement resolves.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Raina C. Borrelli of Strauss Borrelli PLLC (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will apply to the Court for an award of attorneys’ fees, costs, and litigation expenses in an amount not to exceed \$240,000.

A copy of Class Counsel’s Application for Attorneys’ Fees, Costs and Expenses, and Service Award will be posted on the Settlement Website, www.USTDataSettlement.com. At the Final Fairness Hearing, the Court will determine the amounts to be paid to Class Counsel and Plaintiff and may award less than the amount requested by Class Counsel.

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court that I do not like the Settlement?

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you can submit an objection telling it why you do not think the Settlement should be approved. Objections must be submitted in writing and include all the following information:

Such notice shall state:

- (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 whether the objector and/or his or her counsel will appear at the Final Fairness Hearing;
- (vi) the objector's signature and the signature of the objector's duly authorized attorney or other duly authorized representative (along with documentation setting forth such representation); and
- (vii) a list, by case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement within the last three (3) years.

Your Objection must include the case name and docket number, *Amy Crull v. University of St. Thomas*, Cause No. 2025-83309 (the "Lawsuit"), and be submitted to the Clerk of the Court by First-Class mail, received no later than **August 28, 2026**, to:

UST Data Settlement
ATTN: Objection Request
Harris County Civil Courthouse
P.O. Box 4651
Houston, TX 77210-4651

In addition, you must mail a copy of your objection to Class Counsel and Defense Counsel, postmarked no later than **August 28, 2026**:

CLASS COUNSEL	DEFENSE COUNSEL
Raina C. Borrelli STRAUSS BORRELLI PLLC 980 N. Michigan Avenue, Suite 1610 Chicago, IL 60611 T: (872) 263-1100 F: (872) 263-1109 raina@straussborrelli.com	Michelle R. Gomez BAKER & HOSTETLER, LLP 811 Main Street, Suite 1100 Houston, TX 77002

16. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

THE FINAL FAIRNESS HEARING

17. When and where will the Court decide whether to approve the Settlement?

If the Court has not yet scheduled the Final Fairness Hearing at the time of your review of this Notice, please note that the hearing date will be posted once it becomes available. You are encouraged to periodically check the Settlement Website at www.USTDataSettlement.com for the most up-to-date information regarding the Final Fairness Hearing date, time, and location, as well as any related updates issued by the Court.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of Attorneys' Fees, Costs, and Expenses to Class Counsel and the request for a service award to the Class Representative.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Fairness Hearing. However, you are welcome to attend at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Fairness Hearing, but that is not necessary.

19. May I speak at the hearing?

Yes. You can speak at the Final Fairness Hearing, but you must ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required. You cannot speak at the hearing if you exclude yourself from the Settlement.

GET MORE INFORMATION

20. How do I get more information about the Settlement?

This is only a summary of the proposed Settlement. If you want additional information about this lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees, Costs and Expenses and Service Award, and more, please visit www.USTDataSettlement.com or call (833) 421-7269. You may also contact the Claims Administrator at UST Data Settlement, P.O. Box 25226, Santa Ana, CA 92799.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LAWSUIT TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR
DEFENDANT'S COUNSEL.**