

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

In the Chancery Court for the State of Tennessee, Twentieth Judicial District, Davidson County  
*Taylor et al. v. Nissan North America, Inc.*, No. 25-0975-BC

**Did you receive notice of a data breach from Nissan North America, Inc.? You may be eligible for benefits from a class action settlement.**

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

- A settlement has been reached with Nissan North America, Inc., the “Defendant” or “Nissan,” in a class action related to a data breach on or about November 7, 2023, the “Data Incident.”
- You are included in this Settlement as a Settlement Class Member if you were provided notice that your information may have been compromised in the Data Incident.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM FORM</b>	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. You can submit your Claim Form online at <a href="http://www.NNADataSettlement.com">www.NNADataSettlement.com</a> or print a Claim Form from the Settlement Website and mail it to the Settlement Administrator.	<b>May 26, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	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 Settlement Class Member Benefits and you will <u>not</u> be bound by the terms of the Settlement Agreement.	<b>April 24, 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 the Settlement by writing to the Court about why you don’t like it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you want your own attorney to represent you, you must pay for him or her yourself. You will still be bound by the Settlement if the Court approves it. If you object, you may also file a Claim Form for benefits.	<b>April 24, 2026</b>
<b>DO NOTHING</b>	If you do nothing, you will not get any benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another action 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.

Questions? Go to [www.NNADataSettlement.com](http://www.NNADataSettlement.com) or call (833) 319-8483.

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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 class 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 *Thomas Taylor et al. v. Nissan North America, Inc.*, No. 25-0975-BC (Chancery Court for the State of Tennessee, Twentieth Judicial District, Davidson County). The people who filed this Action are called the “Plaintiffs” and the company they sued, Nissan North America, Inc. (“Nissan”), is called the “Defendant”.

### **2. What Is This Action About?**

This Action alleges that Nissan failed to properly secure and safeguard employees’ Private Information including names, Social Security Numbers, dates of birth, pay information and medical records for certain individuals. The Action further alleges that as a result of this failure, cybercriminals gained unauthorized access to Nissan’s computer network on or about November 7, 2023.

Defendant denies all of the Plaintiffs’ claims and maintains 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 the settlement. In this Action, the Class Representatives are Thomas Taylor, Bobby Carter, Ryan Levey, and Zackary Roberts.

### **4. Why Is There A Settlement?**

The Court did not decide in favor of the Plaintiffs or the 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 benefits. The 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 persons who were provided notice that their information may have been compromised because of the Data Incident experienced by Defendant beginning on or about November 7, 2023.

## **6. Are There Exceptions To Being Included?**

Yes. Excluded from the Settlement Class are: (a) all persons who are directors and officers of Defendant, or its respective subsidiaries and affiliated companies; (b) governmental entities; and (c) the Judge(s) assigned to the Action, the Judge's immediate family, and Court staff.

## **THE SETTLEMENT BENEFITS**

## **7. What Can I Get From This Settlement?**

If approved by the Court, the Defendant will pay up to \$1,500,000 to resolve the Action, inclusive of Attorneys' Fees, Service Award payments, Settlement Administrative Costs, and Settlement Class relief.

Settlement Class Members may file a Claim Form to receive either (i) Cash Payment A – Documented Losses or (ii) Cash Payment B – Alternative Cash Payment. Settlement Class Members may also elect to receive two years of Credit Monitoring.

## **8. Tell Me More About Cash Payment A – Documented Losses.**

Settlement Class Members may elect to receive up to \$450 for reimbursement of Ordinary Documented Losses and Expenses with third-party documentation if (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was directly caused by the Data Incident; (iii) the loss was incurred after the date of the Data Incident; and (iv) the loss is not already covered by one or more of the other reimbursement categories. Documentation must be from a third-party source. The categories of reimbursable ordinary expenses and losses include, but are not limited to, bank fees, postage, copying, travel costs, and notary fees related to addressing the misuse of the Settlement Class Members' Social Security number or date of birth; fees for credit repair services; and costs for additional credit reports, credit monitoring, or other identity theft insurance products.

Settlement Class Members may submit a claim for up to \$4,500 for Extraordinary Losses directly caused by the Data Incident. To be valid, the loss must be (i) an unreimbursed expense arising out of the misuse of the Settlement Class Members' Social Security number or date of birth; (ii) directly caused as a result of the Data Incident; (iii) incurred after the Data Incident; and (iv) supported by third-party documentation, such as a police report or submitted insurance claim.

Settlement Class Members who make a claim for Cash Payment A may also make a claim for Credit Monitoring.

## **9. Tell Me More About Cash Payment B – Alternative Cash Payment.**

As an alternative to Cash Payment A above, Settlement Class Members may submit a Claim Form to receive an alternative Cash Payment of up to \$100. This amount is subject to a *pro rata* decrease depending upon the number of Valid Claims submitted.

Settlement Class Members who make a claim for Cash Payment B may also make a claim for Credit Monitoring.

## **10. Tell Me More About Credit Monitoring.**

In addition to one of the Cash Payments above, Settlement Class Members may also submit a Claim Form to receive two years of one-bureau Credit Monitoring with identity theft insurance up to \$1 million. Credit Monitoring has a value of up to approximately \$90 per year per Settlement Class Member.

For Settlement Class Members who originally enrolled in the free credit monitoring offered by the Defendant, the Defendant will, at the election of the Settlement Class Member, extend that monitoring for two additional years that will begin upon the expiration of the current two-year credit monitoring.

For Settlement Class Members who did not originally enroll in the free credit monitoring offered by the Defendant, those Settlement Class Members have the option to enroll in two years of credit monitoring services under the same terms.

## **11. 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 or Released Parties 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.NNADataSettlement.com](http://www.NNADataSettlement.com).

### **HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM**

## **12. How Do I Submit A Claim Form And Get Settlement Benefits?**

You must submit a Claim Form online by **May 26, 2026 at 11:59 p.m. CT** at [www.NNADataSettlement.com](http://www.NNADataSettlement.com), or postmarked by **May 26, 2026** and mailed to the Settlement Administrator at: *Taylor et al. v. Nissan North America, Inc.*, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

## **13. When Will I Get The Settlement 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 **June 1, 2026, at 9:00 a.m. CT**, to decide whether to approve the Settlement, how much in Attorneys’ Fees and Costs to award to Class Counsel for representing the Settlement Class, and whether to approve a Service Award to each of the Class Representatives 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**

## **14. Do I Have A Lawyer In This Case?**

Yes, the Court appointed Jeff Ostrow of Kopelowitz Ostrow P.A., A. Brooke Murphy of Murphy Law Firm, Tyler J. Bean of Siri & Glimstad LLP, and J. Gerard Stranch, IV of Stranch, Jennings & Garvey, PLLC to represent you and other members of the Settlement Class (“Class Counsel”).

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

### 15. 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.

### 16. How Will The Lawyers Be Paid?

Class Counsel's attorneys' fees and litigation costs will be paid from the \$1,500,00 capped settlement amount in an amount determined and awarded by the Court. Class Counsel will request no more than \$500,000 as reasonable Attorneys' Fees and Costs. Class Counsel will also ask the Court to approve a \$3,000 Service Award payment to each of the four Class Representatives for bringing and settling the case.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

### 17. 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 **April 24, 2026**.

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

- A statement indicating that you want to be excluded from the Settlement Class, such as, "I wish to be excluded from the Settlement Class in, *Thomas Taylor et al. v. Nissan North America, Inc.*, No. 25-0975-BC";
- Your name, current address, telephone number, and email address (if any); and
- Your signature.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **April 24, 2026**.

*Taylor et al. v. Nissan North America, Inc.*  
c/o Kroll Settlement Administration LLC  
ATTN: Exclusion Request  
P.O. Box 5324  
New York, NY 10150-5324

## OBJECTING TO THE SETTLEMENT

### 18. 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 and Costs, the 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. Your full name, mailing address, telephone number, and email address (if any);
- b. All grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
- c. The number of times you have objected to a class action settlement within the five years preceding the date that you file your objection, the caption of each case in which you have objected, 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;
- d. 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 the Application for Attorneys' Fees, Costs, and Service Awards, and whether they will appear at the Final Approval Hearing;
- e. The number of times in which your counsel and/or the your 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 on the objection issued by the trial and appellate courts in each such listed case;
- f. A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- g. A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- h. Your signature (an attorney's signature is not sufficient).

Objections must be filed with the Court and copies must be mailed to Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked no later than **April 24, 2026**.

COURT	SETTLEMENT ADMINISTRATOR
Davidson County Chancery Court 1 Public Square, Suite 308 Nashville, TN 37201	<i>Taylor et al. v. Nissan North America, Inc.</i> c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box 5324 New York, NY 10150-5324
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Questions? Go to [www.NNADataSettlement.com](http://www.NNADataSettlement.com) or call (833) 319-8483.

### **19. 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**

### **20. When Is The Court's Final Approval Hearing?**

The Court is scheduled to hold a Final Approval Hearing on **June 1, 2026 at 9:00 a.m. CT**, at the Davidson County Judicial Center, 1 Public Square, Nashville, Tennessee 37201, to decide whether to approve the settlement, Class Counsel's request for Attorneys' Fees and Costs, and the Service Awards to the Class Representatives. The date and time of this hearing may change without further notice. Please check [www.NNADataSettlement.com](http://www.NNADataSettlement.com) for updates.

### **21. 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**

### **22. 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 in the Settlement and not be eligible to receive any benefits from the Settlement.

### **GETTING MORE INFORMATION**

### **23. 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.NNADataSettlement.com](http://www.NNADataSettlement.com).

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (833) 319-8483 or by mail at *Taylor et al. v. Nissan North America, Inc.*, c/o Kroll Settlement Administration LLC, P.O. Box 5324, New York, NY 10150-5324.

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANT.**

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