

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Walker, et al, v. Behavioral Health Resources, Case No. 25-2-00630-34

Superior Court of Thurston County, Washington

IF YOU ARE AN INDIVIDUAL WHO RECEIVED NOTICE FROM BEHAVIORAL HEALTH RESOURCES FOR THE NOVEMBER 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 of Settlement. This is not a solicitation from a lawyer.

You are not being sued.

Please read this Notice of Settlement carefully and completely.

- A Settlement has been reached with Behavioral Health Resources (“BHR” or “Defendant”) in five related class action lawsuits. These cases center around the data security incident on BHR's computer systems that occurred in November of 2024 (the “Data Incident”). Certain files that contained personal information were potentially accessed. These files may have contained personal information such as names, dates of birth, Social Security numbers, medical information, biometric and/or genetic data, government-issued ID, taxpayer identification number (TIN), or health insurance information.
- The related lawsuits filed in the Superior Court of Thurston County, Washington, are resolved by this Settlement. Together these lawsuits are called “Litigation.”
- BHR denies each and all claims and contentions alleged against it and denies all charges of wrongdoing or liability alleged (or which could be alleged) in the Litigation. BHR has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- The parties have agreed to settle the Litigation (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- 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 BHR that their information may have been impacted by the Data Incident.

- Your rights are affected whether you act or don't act. ***Please read this Notice of Settlement carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	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.BHRSettlement.com. 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.	January 12, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no 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.	December 13, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND 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.	December 13, 2025
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—and the deadlines to exercise them—are explained in this Notice of Settlement.
- 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.

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Basic Information

1. Why was this Notice of Settlement issued?

The Superior Court of Thurston County, Washington, authorized this Notice. You have a right to know about the proposed Settlement of these class action lawsuits, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice of Settlement explains the Litigation, your legal rights, what benefits are available, and who can receive them.

The related lawsuits pending in the Superior Court of Thurston County, Washington, are resolved by this Settlement. The names and case numbers of the lawsuits are listed at the top of Page 1. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Behavioral Health Resources, is called the “Defendant.”

2. What is this Litigation about?

The lawsuits allege that during the November 2024 Incident, certain files that contained personal information were potentially accessed. These files may have contained personal information such as name, date of birth, Social Security number, medical information, biometric and/or genetic data, government-issued ID, taxpayer identification number (TIN), or health insurance information.

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 “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 Class Representatives are Carol Walker, Rebecca A. Campos, Adam Shotswell, Smukweshun Okena and Kim Ridgway. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. 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 attorney think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: “All U.S. residents whose Personal Information was compromised in the data incident disclosed by Behavioral Health Resources on or about November 20, 2024.”

6. Are there exceptions to being included?

Anyone who fits the Class definition and doesn’t validly exclude themselves from the Settlement will be included.

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@BHRSettlement.com
- Call toll free, 24/7: 1-833-417-4912
- By mail: BHR Data Breach Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

BHR will establish a Settlement Fund of \$1,100,000.00. The Settlement Fund will first be used to pay court-approved attorneys’ fees and costs, Service Award payments for the Plaintiffs, and the costs of administering the Settlement. The amount remaining in the Settlement Fund will be used to pay for the benefits described below. You may claim as many benefits as apply to you.

BENEFITS

Medical Data Monitoring. All Settlement Class Members are eligible to enroll in three years of CyEx Medical Shield Total. This comprehensive service comes with \$1 million of medical identity theft insurance, and includes monitoring for:

- Healthcare insurance ID exposure;
- Medical Record Number (MRN) exposure; and
- Unauthorized Health Savings Account (HSA) spending.

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

Documented Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can receive reimbursement of up to **\$5,000.00**. The losses must have occurred between November 20, 2024, and January 12, 2026.

This benefit covers out-of-pocket losses, including but not limited to:

- Losses suffered as a result of identity theft or fraud;
- Fees for credit reports, credit monitoring, or freezing and unfreezing your credit;
- Cost to replace your IDs; and
- Postage to contact banks by mail.

You are required 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 should show that your expenses were because of the Data Incident.

Reimbursement for Lost Time. Settlement Class Members who spent time responding to the Data Incident may claim up to five (5) hours, at \$25.00 per hour, for a maximum of **\$125.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- Changing your passwords;
- Remedying identity theft or fraud suffered as a result of the Data Incident;
- Investigating suspicious activity in your accounts; and
- Researching the Data Incident.

You must briefly describe how you spent this time.

Pro Rata Cash Payment. You may also claim a one-time cash payment. This payment is expected to be **\$100.00** but may be larger or smaller depending on the total claims filed. You do not have to provide any proof or explanation to claim this payment.

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

- Email: info@BHRSettlement.com
- Call toll free, 24/7: 1-833-417-4912
- By mail: BHR Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958.

8. What claims am I releasing if I stay in the Class?

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against BHR about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section X) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.BHRSettlement.com.

Submitting a Claim Form for Settlement Benefits

9. How do I submit a claim for a Settlement benefit?

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

BHR 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, 1-833-417-4912, by email info@BHRSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **January 12, 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 **January 12, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **February 6, 2025 (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants Final Approval, and after any appeals are resolved.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Kaleigh N. Boyd and Joan M. Pradhan of Tousley Brain Stephens PLLC; and William B. Federman and Tanner R. Hilton of Federman & Sherwood, to represent you and other Class Members ("Class Counsel").

13. 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.

14. How will Class Counsel be paid?

Class Counsel will ask the court to approve up to one-third of the Settlement Fund as reasonable attorneys' fees and no more than \$25,000.00 for costs of litigation. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments will also be paid from the Settlement Fund.

Excluding Yourself from the Settlement

15. 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 called a Request for Exclusion and 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 BHR 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 exclude yourself from the Settlement is **December 13, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the reference case: *Walker v. Behavioral Health Resources*, Case No. 25-2-00630-34, pending in the Superior Court of Thurston County, Washington;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

BHR Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted or postmarked by **December 13, 2025**.

Objecting to the Settlement

16. 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 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 15**).

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

- (1) the name of the reference case: *Walker v. Behavioral Health Resources*, Case No. 25-2-00630-34, pending in the Superior Court of Thurston County, Washington;

- (2) your full name, mailing address, telephone number, and email address;
- (3) whether the objection applies only to you, or to other Settlement Class Members, as well;
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (6) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both; and
- (7) your signature (if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **December 13, 2025**. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 2000 Lakeridge Drive SW, Bldg 2 Olympia, WA 98502-6001	BHR Data Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

17. 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

18. When is the Court's Final Approval Hearing?

The Court will hold a Final Approval Hearing on **February 6, 2026 at 9:00 a.m. Pacific Time**, in the Superior Court of Thurston County, Washington, at 2000 Lakeridge Drive SW, Bldg 2, Olympia, WA 98502.

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 (**See Question 16**).

The date and time of this hearing may change without further notice. Please check www.BHRSettlement.com for updates.

19. 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

20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

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

Getting More Information

21. How do I get more information?

This Notice of Settlement is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.BHRSettlement.com.

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

- Email: info@BHRSettlement.com
- Call toll free, 24/7: 1-833-417-4912
- By mail: BHR 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, 2000 Lakeridge Drive SW, Bldg 2, Olympia, WA 98502-6001.

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