United States District Court, Southern District of New York
In re: Warner Music Data Breach
Case No. 1:20-cv-07473-PGG

Class Action Notice

Authorized by the Southern District of New York

Did you make a purchase on a website operated by or on behalf of one of Warner Music Group Corporation's subsidiaries between April 25, 2020 and August 5, 2020?

There is a $1,250,000 settlement of a class action lawsuit related to an alleged cybersecurity incident.

You may be entitled to a cash payment.

To be part of this Settlement, you should:

Read this Notice.

Respond by January 22, 2027.

Important things to know:

- If you take no action and are a Settlement Class Member, you will still be bound by the Settlement, and your rights will be affected. ***Please read this Notice carefully and completely.***
- You can learn more at: www.WMGDataSettlement.com.

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About This Notice

Why did I get this Notice?

This Notice is to tell you about the proposed settlement of a class action lawsuit, *In re: Warner Music Group Data Breach*, which is pending in the United States District Court for the Southern District of New York. The lawsuit concerns a cyberattack on websites operated by or on behalf of subsidiaries of Warner Music Group Corp. (the "Defendant") during which unauthorized users may have gained access to certain consumer payment card information (the "2020 Cybersecurity Incident").

You received this Notice because you may be a member of the group of people who made a purchase using a payment card on a website operated by or on behalf of one of Warner Music Group Corp.'s subsidiaries between April 25, 2020 and August 5, 2020, called the "Settlement Class."

This Notice gives you a summary of the terms of the proposed settlement agreement, explains what rights Settlement Class Members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this Notice to understand the Settlement and to determine if you are a class member. Then, decide if you want to:

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive your cash benefit from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.WMGDataSettlement.com.	**January 22, 2027**
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefits by submitting a Request for Exclusion Form. This is the only option that potentially allows you to ever make claims on your own or be part of any other lawsuit	**November 23, 2026**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
	against Defendant or any other Warner Released Parties asking for damages due to the 2020 Cybersecurity Incident.	
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not like the Settlement, but 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 object to Class Counsel's Attorneys' Fees and Expense Request and ask the Court for permission to speak about your objection at the Final Approval Hearing.	**November 23, 2026**
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 make claims on your own or be part of any other lawsuit against Defendant or the Warner Released Parties related to the legal claims resolved by this Settlement.	No Deadline

The Court in charge of this case still has to decide whether to approve the Settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to Object or 'Opt-Out': **November 23, 2026**
Settlement Final Approval Hearing: **January 29, 2027**
Your deadline to submit a Claim Form: **January 22, 2027**

Basic Information

What is this lawsuit about?

This lawsuit concerns the cybersecurity incident involving e-commerce websites operated by or on behalf of Defendant's subsidiaries. Plaintiffs allege that the cybersecurity incident resulted in unauthorized third

parties gaining access to consumer payment information associated with purchases made on the sites between April 25, 2020 and August 5, 2020. Defendant denies all claims alleged against it and denies all charges of wrongdoing or liability. The Settlement is not an admission of wrongdoing or an indication that Defendant has violated any laws, but rather the resolution of disputed claims.

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 known as "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.

Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendant. Plaintiffs and Defendant 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. Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

How do I weigh my options?

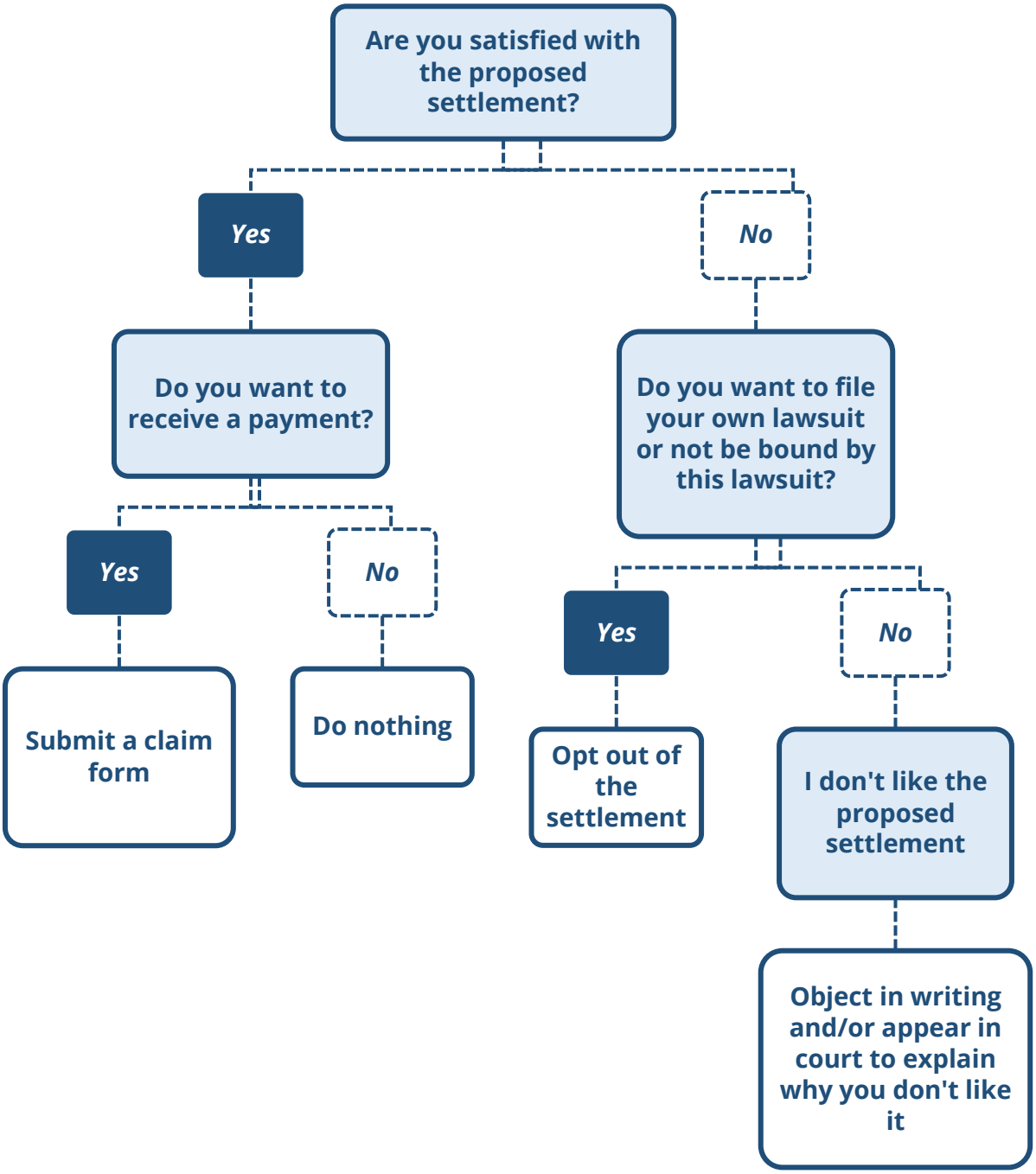
You have four options. You can stay in the Settlement and submit a claim, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. If you object to the Settlement, you can still obtain your settlement benefit, but you must file a claim to do so.

This chart shows the effects of each option:

	Submit a Claim	**Opt Out**	**Object**	**Do Nothing**
Can I receive Settlement money if I . . .	YES	NO	YES	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES

Can I pursue my own case if I . . .	NO	YES	NO	NO

What is the best path for me?



Who is in the Settlement?

Who is included in the Settlement?

The Settlement Class is defined as: All natural persons residing in the United States who made payment card purchases on e-commerce websites operated by or on behalf of Defendant's subsidiaries between April 25, 2020 and August 5, 2020.

The California Subclass is defined as: All members of the Settlement Class who were residents of the State of California between April 25, 2020 and August 5, 2020, and who made payment card purchases on e-commerce websites operated by or on behalf of Defendant's subsidiaries during that time period.

Are there exceptions to being included?

Yes. The Settlement Class specifically excludes: (i) Defendant and its parents, subsidiaries, affiliated entities under common corporate ownership, officers, directors, employees, and any entity in which Defendant has a controlling interest; (ii) all Persons who timely and validly request exclusion from the Settlement Class; (iii) any individual who would otherwise be included in the Settlement Class, but has agreed, in another proceeding, to release claims covered by this Settlement; and (iv) the Judge assigned to evaluate the fairness of this Settlement, the judge's staff, and the members of the judge's immediate family.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator by mail, email, or by calling toll-free.

Warner Music Data Breach Settlement
c/o Settlement Administrator
P.O. Box 628, Baton Rouge, LA 70821
info@WMGDataSettlement.com
1-844-372-1010

You may also view the Settlement Agreement at

www.WMGDataSettlement.com.

The Settlement Benefits

What does the Settlement provide?

The Settlement provides for the creation of a $1,250,000.00 Settlement Fund to pay for valid weighted *pro rata* cash payments to Settlement Class Members, costs of settlement administration, Service Awards to Representative Plaintiffs, and Attorneys' Fees and Litigation Expenses.

The Settlement benefits are summarized below. Visit the case website at www.WMGDataSettlement.com for full description of these benefits.

Weighted *Pro Rata* Cash Claim Payment.

All Settlement Class Members are eligible to make a claim for a cash payment from the Net Settlement Fund. The Settlement Fund will first be used to pay costs of Notice and settlement administration, then Service Awards to the Class Representatives and Class Counsel's Attorneys' Fees and Expenses as may be awarded by the Court. The remainder will be known as the Net Settlement Fund. The Settlement Administrator will make payments from the Net Settlement Fund to Settlement Class Members and California Subclass members as follows: Each Settlement Class Member and California Subclass Member shall have the opportunity to submit a claim to receive their weighted *pro rata* portion of the Net Settlement Fund on or before the Claims Deadline. Settlement Class Members will receive one (1) share of the Net Settlement Fund per valid claim; California Subclass Members will receive one (1) additional share (for a total of two (2) shares) per valid claim.

The estimated weighted *pro rata* Cash Claim Payment is $50 for Settlement Class Members and $100 for California Subclass Members.

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 Defendant or the Released Parties about any of the legal claims this Settlement resolves. The "Releases" section of the Settlement Agreement describes the legal

claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available for review at www.WMGDataSettlement.com.

Submitting a Claim Form for Settlement Benefits

How do I submit a claim for a Settlement benefit?

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

Warner Music Data Breach Settlement
P.O. Box 628
Baton Rouge, LA 70821

You may also contact the Settlement Administrator to request a Claim Form by calling toll-free 1-844-372-1010, by emailing: info@WMGDataSettlement.com, or by writing to the address above.

What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by January 22, 2027. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is postmarked no later than January 22, 2027.

When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on January 29, 2027. 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 benefits will be distributed if the Court grants final approval of the Settlement and after any appeals are resolved, or after the period to seek an appeal has expired.

The Lawyers Representing You

Do I have a lawyer in the case?

Yes, the Court appointed Jean S. Martin of Aylstock Witkin Kreis & Overholtz PLC and Gayle M. Blatt of Casey Gerry Francavilla Blatt, LLP as Class Counsel.

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110 Laurel Street
San Diego, CA 92101
Telephone: 619-238-1811
gmb@cglaw.com

Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want to be represented by your own lawyer, you may hire one at your own expense.

How will Class Counsel be paid?

Class Counsel will file an application for an award of Attorneys' Fees to be paid from the Settlement Fund. Class Counsel will also seek reimbursement of reasonable Litigation Expenses, in addition to any Attorneys' Fee award.

Class Counsel's application for an award of Attorneys' Fees will be available at www.WMGDataSettlement.com after it is filed with the Court.

Excluding Yourself from the Settlement

How do I opt out of the Settlement?

If you do not want to receive any benefit from the Settlement, and you want to keep your right, if any, to separately sue Defendant about the legal issues in this case (subject to any defenses Defendant may have to such a suit, including the statutes of limitation), there are steps that you must take to exclude yourself from the Settlement Class. This is called requesting an exclusion from, or "opting out" of the Settlement Class. The deadline to submit a Request for Exclusion from the Settlement is November 23, 2026.

To exclude yourself from the Settlement, you must submit a written Request for Exclusion by mail that includes the following information:

(i) the name of the Action, *In re: Warner Music Data Breach*, Case No. 1:20-cv-07473-PGG;
(ii) the Class Member's full name, mailing address, email address, and telephone number;
(iii) a specific statement of the Class Member's intention to be excluded from the settlement;
(iv) the identity and telephone number of the Class Member's counsel, if represented; and
(v) The Class Member's personal signature.

Requests for Exclusion forms are available for download at www.WMGDataSettlement.com. Your Request for Exclusion must be mailed to the Settlement Administrator at the address below, **postmarked no later than November 23, 2026**.

Warner Music Data Breach Settlement
ATTN: Exclusion Request
P.O. Box 628,
Baton Rouge, LA 70821

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.

You may only exclude yourself—not any other person. **Any Settlement Class Member who does not file a timely request for exclusion in accordance with this section will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.**

Commenting on or Objecting to the Settlement

How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class Member and you do not like the Settlement, you can object to it, if you choose. You can give reasons why you think the Court should not approve it. The Court will consider your views.

For an objection to be a valid objection under the Settlement, it must include or substantially comply with the following: (a) the objector's full name, mailing address, email address, and telephone number; (b) the case name and docket number, *In re: Warner Music Data Breach*, Case No. 1:20-cv-07473-PGG, pending in the United States District Court for the Southern District of New York; (c) information identifying the objector as a Class Member, including the reason for believing that the objector is a Class Member; (d) a statement whether the objector intends to appear at the Final Approval Hearing and, if so, whether personally or through counsel; (e) a written statement of all grounds for the objection; and (f) the identity of any and all counsel representing the objector in connection with the objection.

To be timely, an objection must be filed with the Court or postmarked no later than **November 23, 2026**. Objections may also be filed with the Court through the Court's ECF system or by submitting them to the Clerk of Court in person or by mail to any location of the United States District Court for the Southern District of New York, including Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007.

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. You can object to the Settlement, and still receive your Settlement benefit if you file a timely claim. 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, and you will not receive any Settlement benefit.

The Court's Final Approval Hearing

When is the Court's Final Approval Hearing?

The Court will hold a Final Approval Hearing on **January 29, 2027 at 10:00 a.m.**, in Courtroom 705 at 40 Centre Street, New York, NY 10007.

At the Final Approval Hearing, the Court will consider whether to approve the Settlement, Class Counsel's motion for Attorneys' Fees and Expenses, and Plaintiffs' motion for Service Awards. The Court will also consider any objections to the Settlement that were submitted in accordance with the requirements set forth herein.

If you are a Settlement Class Member, you or your attorney 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.WMGDataSettlement.com for updates.

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. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary.

If I Do Nothing

What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights described herein, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against Defendant and the Released Parties about the legal issues resolved by this Settlement. In addition, if you do nothing, you will not receive any benefit from this Settlement.

Getting More Information

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.WMGDataSettlement.com.

If you have additional questions, you may contact the Settlement Administrator by mail, email, or by calling toll-free.

Warner Music Data Breach Settlement
P.O. Box 628
Baton Rouge, LA 70821

Email: info@WMGDataSettlement.com
Phone: 1-844-372-1010

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, at 40 Foley Square, New York, NY 10007

DO <u>NOT</u> CONTACT THE COURT OR CLERK OF COURT REGARDING QUESTIONS ABOUT THIS SETTLEMENT.