#### SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MONMOUTH COUNTY

# Notice of CentraState Healthcare System, Inc. Data Security Incident Litigation Settlement

A state court has authorized this Notice. This is <u>not</u> a solicitation from a lawyer. **Please read this Notice carefully and completely, as it may affect your legal rights.** 

# **IMPORTANT MESSAGE FROM THE COURT**

To receive benefits and/or payments from this Settlement, simply tear off and mail the Claim Form attached to the postcard you received (postage is prepaid) or go to <a href="www.CentraStateSettlement.com">www.CentraStateSettlement.com</a> and submit a Claim Form using your Claim Number and Last Name (located on the postcard notice you received). Please read below for additional information regarding the benefits and/or payments that you may be eligible to receive from this Settlement.

# THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

- A proposed Settlement has been reached in a class action lawsuit with CentraState Healthcare System, Inc. ("CentraState") and Atlanta Health System, Inc. 1 ("Atlantic Health System") (together, "Defendants") relating to the data security incident announced in February 2023 (the "Security Incident").
- If you received a notice from CentraState in or around February 2023 about the Security Incident, you are included in this Settlement as a "Settlement Class Member."
- Under the Settlement, Defendants have agreed to establish a Settlement Fund to pay for (1) cash benefits to eligible Settlement Class Members; and (2) the costs of the settlement administration, court-approved attorneys' fees and expenses, and service awards for Class Representatives. In addition, under the Settlement, Defendants have agreed, on a claims-made basis, to (1) pay for out-of-pocket costs that are fairly traceable to the Security Incident up to \$3,000 per eligible Settlement Class Members; and (2) provide eligible Settlement Class Members with 3 years of medical data monitoring services and \$1,000,000 in insurance for medical identity theft. Also, Defendants have agreed to change certain business practices to better protect against future security incidents.
- The Court in charge of this case has granted preliminary approval of the Settlement, but has not yet decided whether to grant final approval of the Settlement. No Settlement benefits or payments will be provided unless the Court grants final approval of the Settlement and the Settlement becomes final.
- These rights and options—and the deadlines to exercise them—are explained in this Notice. <u>If you are a Settlement Class Member, your legal rights will be affected whether or not you take action.</u> Please read this entire Notice carefully.

<sup>&</sup>lt;sup>1</sup> Since January 1, 2022, Atlantic Health System, Inc. has held a majority stake in CentraState Healthcare System, Inc.

SUBMIT A CLAIM FORM AND OBTAIN BENEFITS UNDER THE SETTLEMENT  EXCLUDE YOURSELF FROM THE SETTLEMENT  OBJECT TO OR COMMENT ON THE COMMENT ON THE SETTLEMENT  ACLAIM FORM AND OBTAIN BENEFITS UNDER THE SETTLEMENT  Submitting a Claim Form is the only way that you can receive any benefits provided by this Settlement, including medical data monitoring services and/or a payment from the Settlement.  If you submit a Claim Form, you will give up the right to sue the Defendants and certain related parties in any separate lawsuit about the legal claims this Settlement resolves.  This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendants, or certain related parties, for the claims this Settlement resolves.  If you exclude yourself, you will give up the right to receive any benefits from this Settlement.  You may object to the Settlement by filing a statement with the Settlement Administrator and informing it why you don't think the Settlement should be approved and mailing a copy of the statement to the addresses set forth below. You can also write to the Settlement Administrator to provide comments or reasons why you support the Settlement.  If you object, you may also submit a Claim Form to receive
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Settlement benefits, and you will give up the right to sue the Defendants in a separate lawsuit about the legal claims this
Settlement resolves.
ATTEND THE FINAL You may attend the Final Fairness Hearing where the Court September 27,
FAIRNESS HEARING may hear arguments concerning the approval of the 2024
Settlement. You are <u>not</u> required to attend the Final Fairness
Hearing.
Do Nothing If you do nothing, you will not receive any of the Settlement
benefits and you will give up your rights to sue Defendants and
certain related parties for the claims this Settlement resolves.

#### **BASIC INFORMATION**

# 1. Why did I get this Notice?

A state court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Honorable Mara Zazzali-Hogan of the Superior Court of New Jersey, Law Division: Monmouth County, is overseeing this case. This lawsuit is known as *In re: CentraState Healthcare Data Security Incident Litigation*, No: MON-L-504-23 (the "Action"). The people who filed this lawsuit are called the "Plaintiffs," and the companies they sued, CentraState and Atlantic Health System, are called the "Defendants."

#### 2. What is this lawsuit about?

In February 2023, CentraState announced that it was subject to a ransomware attack wherein unauthorized parties potentially accessed, viewed, and/or acquired copies of some documents on its computer systems, which may have contained the personally identifiable information and protected health information of approximately 569,984 individuals known as Settlement Class Members (*see* Question 7). The information that could have been accessed without authorization during the Security Incident includes names, addresses, Social Security Numbers, dates of birth, health insurance information, and other medical records.

The Plaintiffs filed this lawsuit because they claim that Defendants failed to adequately protect their information and provide timely notice of the Security Incident and that they were injured as a result. Defendants denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that the law has been violated. The Defendants denies the claims made by the Plaintiffs in the Action. By entering into the Settlement, Defendants are not admitting any wrongdoing.

# 3. Why is this a class action?

In a class action, one or more people called the Class Representatives sue on behalf of all people who have similar claims. Together all of these people are called a Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who exclude themselves from the Class.

The three Class Representatives in this case are Frederick Dawes, Ricardo Cubides, and Laura Kanthal-Dubides.

# 4. Why is there a Settlement?

The Class Representatives and the Defendants do not agree about the claims made in this Action. The Action has not gone to trial, and the Court has not decided in favor of the Class Representatives or the Defendants. Instead, the Class Representatives and the Defendants have agreed to settle the Action. The Settlement does not mean that any law was broken or that Defendants did anything wrong. The Class Representatives and the attorneys for the Class ("Class Counsel") believe the Settlement is best for all Settlement Class Members because of the risks and uncertainty associated with continued litigation and the nature of the defenses raised by the Defendants.

## 5. How do I know if I am part of the Settlement?

If you received a mailed notice of this Settlement, you have been identified as a Settlement Class Member and included in the Settlement. More specifically, you are a Settlement Class Member, and you are affected by this Settlement, if you are a person in the United States, your information was maintained on the CentraState systems that were impacted as a result of the Security Incident, and you received a notice from CentraState in or around February 2023 concerning the Security Incident.

## 6. Who is not included in the Settlement?

The Settlement does not include (1) any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff; (2) the Defendants, any entity in which the Defendants have a controlling interest, and the Defendants' officers, directors, legal representatives,

successors, subsidiaries, and assigns; and (3) any individual who timely and validly requests to be excluded from the Settlement Class and their successors or assigns of any such excluded persons.

# 7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at <a href="https://www.CentraStateSettlement.com">www.CentraStateSettlement.com</a>, or call the toll-free number, 1-877-411-4707. You may also send questions to the Settlement Administrator at CentraState Settlement, c/o A.B. Data, Ltd., P.O. Box 170800, Milwaukee, WI 53217.

# 8. What does the Settlement provide?

If the Settlement is approved and becomes final, it will provide Settlement Class Members with the following benefits:

- Three years of comprehensive Medical Data Monitoring, services provided through CyEx by Pango Group;
- Cash benefit payment, depending on the participation rate for the Settlement, the amount of which will be a pro rata share of the remaining Net Settlement Fund; and
- Cash payment of up to \$3,000 for Documented Out-of-Pocket Costs, for documented losses and/or out-of-pocket costs fairly traceable to the Security Incident.

# 9. Tell me more about the Medical Data Monitoring services.

Medical Data Monitoring provides a way to monitor and protect yourself from unauthorized use of your medical and healthcare information. The Medical Data Monitoring services are being provided by CyEx by Pango Group. The Medical Data Monitoring benefit offered in this Settlement includes up to 3 years of medical data monitoring services, which will monitor medical and healthcare data to determine whether private medical information is at risk or has been exposed to medical fraud, provide real-time alerts when suspicious activity is detected, provide up to \$1,000,000 of insurance for medical identity theft with no deductible.

More information about the Medical Data Monitoring being provided by CyEx through this Settlement is available at https://cyex.com/medical-shield/.

## 10. Tell me more about the Cash Benefit Payment.

You may qualify for a "Cash Benefit Payment."

Each Participating Settlement Class Member electing to receive a Cash Benefit Payment will receive a payment from the Net Settlement Fund. The payment amount will depend on the participation rate for the Settlement and the amount will be each Participating Settlement Class Member's pro rata share of the remaining Net Settlement Fund, after payment of settlement administration costs, service awards to Class Representatives, and Class Counsels' fees and costs.

The following chart depicts an approximation of the Cash Benefit Payment:

Participation Rate	Approx. Cash Payment
2%	\$141.30
4%	\$70.65
6%	\$47.10
8%	\$35.32
10%	\$28.26

The act of submitting a valid Claim Form to the Settlement Administrator (via U.S. Mail or through the Settlement Website) entitles a Class Member to be a Participating Settlement Class Member and constitutes a representation that they are electing to receive a Statutory Payment under the Settlement.

# 11. Tell me more about Cash Payments for Out-of-Pocket Costs.

If you spent money remedying or addressing identity theft or fraud that was fairly traceable to the Security Incident, or if you spent money to protect yourself from future harm because of the Security Incident, you may make a claim for reimbursement of up to \$3,000 in Out-of-Pocket Costs. Out-of-Pocket Costs consist of unreimbursed costs or losses incurred on or after December 29, 2022, including losses related to identity theft or fraud, which are fairly traceable to the Security Incident. For example, late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, card cancellation or replacement fees, credit-related costs associated with purchasing credit reports, credit monitoring or identity theft protection, costs to place a freeze or alert on credit reports, and costs to replace a driver's license, state identification card or a social security number. Other losses or costs fairly traceable to the Security Incident may also be eligible for reimbursement.

# 13. Have Defendants taken remedial measures in response to the data incident?

Yes, Defendants have agreed to implement certain reasonable steps to secure its systems and environments from future threats.

# 14. What is the total value of the Settlement?

Defendants have agreed to pay \$3 million into a Settlement Fund to pay for all Cash Benefit Payments and Out-of-Pocket Costs that exceed \$300,000.00. Any court-approved attorneys' fees and costs; service awards to the Class Representatives; taxes due on any interest earned by the Settlement Fund, if necessary; and any notice and settlement administration expenses will be paid out of the Settlement Fund; and the balance ("Net Settlement Fund") will be used to pay for the above benefits. In addition, Defendants have agreed to pay Out-of-Pocket Costs up to \$300,000.00 and Medical Data Monitoring services for up to 3 years to eligible Settlement Class Members on a claims-made basis. Plaintiffs conservatively estimate that the value of the Settlement Benefits conferred to the Settlement Class is likely in excess of \$4 million, based on the amount of the Settlement Fund, reimbursement of Out-of-Pocket Costs, the value of at least three years of Medical Data Monitoring services provided to Settlement Class Members, and the improvements to Defendants' data security practices. The total value of the Settlement Benefits provided to the Class is \$3,300,000.00 plus the estimated costs of Defendant's business practice changes and an additional \$3,067,653.89 for every one percent (1%) of Class Members receiving Medical Data Monitoring services, before excluding the cost of Medical Data Monitoring services. Therefore, if one

percent (1%) of the Settlement Class enrolls in Medical Data Monitoring, the total value of the Settlement Benefits offered to the Settlement Class is \$6,367,653.89, before excluding the cost of Medical Data Monitoring services. Plaintiffs will provide the exact value of the Settlement prior to the Final Fairness Hearing based on the final number of claims submitted. Defendants take no position with respect to the value of the Settlement.

# 15. What am I giving up to get a Settlement payment or stay in the Settlement Class?

Unless you exclude yourself, you are choosing to remain in the Class. If the Settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You won't be able to sue, continue to sue, or be part of any other lawsuit against Defendants or related parties about the legal issues in this Action that are resolved by this Settlement and released by the Class Action Settlement Agreement and Release ("Settlement Agreement"). The specific rights you are giving up are called Released Claims (see next question).

## 16. What are the Released Claims?

In exchange for the Settlement, Settlement Class Members agree to release Defendants and their respective predecessors, successors, assigns, parents, subsidiaries, divisions, affiliates, departments, and any and all of their past, present, and future officers, directors, employees, investors, owners, stockholders, partners, servants, agents, successors, attorneys, representatives, insurers, reinsurers, subrogees, and assigns of any of the foregoing, as well as Plaintiffs and Class Counsel ("Released Parties") from all claims or causes of action, including causes of action in law, claims in equity, complaints, suits or petitions, and allegations of wrongdoing, demands for legal, equitable or administrative relief (including, but not limited to, claims for injunction, rescission, reformation, restitution, disgorgement, constructive trust, declaratory relief, compensatory damages, consequential damages, penalties, exemplary damages, breach of contract, breach of the duty to settle or indemnify, breach of the covenant of good faith and fair dealing, punitive damages, attorneys' fees, costs, interest, expenses, or other potential claim), regardless of whether the claims or causes of action are based on federal, state, or local law, statute, ordinance, regulation, contract, common law, or another source, that the Releasing Parties had or have (including, but not limited to, assigned claims) that have been or reasonably could have been asserted in the Action or in another action or proceeding before any court, arbitrator(s), tribunal or administrative body (including but not limited to any state, local or federal regulatory body) based on the same set of operative facts as alleged in the Complaint ("Released Claims").

The Released Claims do not include claims against the cyber attacker(s) who committed the criminal acts involved in the Security Incident and persons or entities that intentionally misuse the information potentially compromised in the Security Incident for unlawful purposes.

More information is provided in the Settlement Agreement which is available at www.CentraStateSettlement.com.

## HOW TO GET SETTLEMENT BENEFITS — SUBMITTING A CLAIM FORM

## 17. How do I make a claim for Settlement Benefits?

Claim Forms may be submitted online at <a href="www.CentraStateSettlement.com">www.CentraStateSettlement.com</a> or mailed to the Settlement Administrator at the address on the form. Claim Forms are also available for download on the Settlement Website (www.CentraStateSettlement.com) or you may request one by writing to the Settlement Administrator at CentraState Settlement, c/o A.B. Data, Ltd., P.O. Box 170800, Milwaukee, WI 53217.

The quickest way to file a claim is online through the Settlement Website

If you received a postcard notice by mail or an email notice, please use your Claim Number and Last Name, located directly above your name, to file your Claim Form online. If you lost or do not know your Claim Number, please call the toll-free number 1-877-411-4707 to obtain it. **The deadline to complete and submit a Claim Form is October 7, 2024.** 

# 18. How do I make a claim for Medical Data Monitoring services?

If you received a postcard notice in the mail, you may use the Claim Form provided to file a claim for Medical Data Monitoring services. Simply provide your email address (required to obtain Medical Data Monitoring services), tear the Claim Form at the perforation, and place it in the mail postmarked on or before **October 7**, **2024**. If you prefer not to provide your email address on the tear-away Claim Form mailed to you, you may instead submit a Claim Form online or mail a Claim Form to the Settlement Administrator.

You may access the Claim Form, file a claim, and obtain additional information at <a href="https://www.CentraStateSettlement.com">www.CentraStateSettlement.com</a>. Instructions for filling out a claim for Medical Data Monitoring services are included on the Claim Form. The deadline to file a claim for Medical Data Monitoring services is October 7, 2024. You may file a claim for Medical Data Monitoring in addition to claims for Cash Benefit Payment and Out-of-Pocket Costs.

# 19. How do I make a claim for a Cash Benefit Payment?

If you received a Notice in the mail, you may use the Claim Form provided to file a claim for a cash payment. To file a claim for a Cash Benefit Payment, simply tear the Claim Form at the perforation, and place it in the mail postmarked on or before **October 7**, **2024**. In order to receive your payment, simply provide your email address on the Claim Form. If you prefer not to provide your email address on the tearaway Claim Form mailed to you, you may instead submit a Claim Form online or mail a Claim Form to the Settlement Administrator.

You may access the Claim Form, file a claim, and obtain additional information at <a href="https://www.CentraStateSettlement.com">www.CentraStateSettlement.com</a>. Instructions for filling out a claim for Statutory Payment are included on the Claim Form. The deadline to file a claim for Cash Benefit Payment is October 7, 2024. You may file a claim for Statutory Payment in addition to claims for Medical Data Monitoring and Out-of-Pocket Costs.

## 20. How do I make a claim for Out-of-Pocket Costs?

To file a claim for a cash payment of up to \$3,000 for reimbursement of Out-of-Pocket Costs, you must submit a valid Claim Form electing to receive a payment for Out-of-Pocket Costs. The Claim Form requires that you sign the attestation regarding the information you provided <u>and</u> that you include Reasonable Documentation, such as credit card statements, bank statements, invoices, telephone records, and receipts.

You may access the Claim Form, file a claim, and obtain additional information at <a href="https://www.CentraStateSettlement.com">www.CentraStateSettlement.com</a>. Instructions for filling out a claim for Out-of-Pocket Costs are included on the Claim Form. **The deadline to file a claim for Out-of-Pocket Costs is October 7, 2024.** You may file a claim for Out-of-Pocket Costs in addition to claims for Medical Monitoring and Cash Benefit Payment.

# 21. What happens if my contact information changes after I submit a claim?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by writing to the Settlement Administrator at CentraState Settlement, c/o A.B. Data, Ltd., P.O. Box 170800, Milwaukee, WI 53217.

#### 22. When and how will I receive the benefits I claim from the Settlement?

If you make a valid claim for Medical Data Monitoring, the Settlement Administrator will send you information on how to activate your monitoring service after the Settlement becomes final. If you received a postcard notice in the mail, keep it in a safe place, as you will need the unique Claim Number provided on the postcard notice to activate your Medical Data Monitoring at the CyEx website.

# 23. What happens if money remains after all of the Settlement Claims are paid?

None of the money in the \$3 million Settlement Fund will be paid back to Defendants. If there is any money left in the Settlement Fund 150 days after the distribution of payments to Settlement Class Members, a subsequent Settlement Payment will be evenly made to all Participating Settlement Class Members with Approved Claims, provided that the average payment amount is equal to or greater than five dollars and no cents (\$5.00). If the average payment amount in a distribution would be less than five dollars and no cents (\$5.00), the remaining Net Settlement Fund will be used to extend the Medical Data Monitoring services to Participating Settlement Class Members receiving that benefit for as long as possible. Any residual funds remaining in the Net Settlement Fund will not revert to Defendants.

# THE LAWYERS REPRESENTING YOU

## 24. Do I have a lawyer in this case?

Yes. The Court has appointed attorneys at the law firms below to represent you and the other Settlement Class Members in this lawsuit. These lawyers are called "Class Counsel."

James E. Cecchi	Linda P. Nussbaum	Todd S. Garber
Carella, Byrne, Cecchi,	Nussbaum Law Group, P.C.	Finkelstein, Blankinship,
Olstein, Brody & Agnello,	1133 Avenue of the	Frei-Pearson & Garber, LLP
P.C.	Americas, 31 <sup>st</sup> Floor	One North Broadway
5 Becker Farm Road	New York, NY 10036	Suite 900
Roseland, NJ 07068		White Plains, NY 10601

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one at your own expense.

# 25. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award them attorneys' fees and expenses of up to 33.33% of the Settlement Fund. They will also ask the Court to approve \$500.00 service awards to each of the Class Representatives for participating in this Action and for their efforts in achieving the Settlement. If awarded, these amounts will be deducted from the Settlement Fund before making payments

to Settlement Class Members. The Court may award less than these amounts.

Class Counsel's application for attorneys' fees, expenses, and service awards will be made available on the Settlement Website at <a href="www.CentraStateSettlement.com">www.CentraStateSettlement.com</a> before the deadline for you to comment or object to the Settlement.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue the Defendants on your own, based on the claims raised in this Action or released by the Released Claims, then you must take steps to exclude yourself or "opt-out" of the Settlement.

# 26. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement, you must complete and sign a Request for Exclusion. The Request for Exclusion must identify the case name *In re: CentraState Healthcare Data Security Incident Litigation*, No: MON-L-504-23, include your name and current mailing address, telephone number, and email address; a statement that you want to be excluded from the Settlement; and your signature. The Request for Exclusion must be addressed to the Settlement Administrator at the address below and postmarked no later than **September 7, 2024.** 

CentraState Settlement Objections c/o A.B. Data, Ltd. P.O. Box 170800 Milwaukee, WI 53217

# You cannot exclude yourself online, by telephone, or by email.

# 27. If I exclude myself, can I still get Medical Data Monitoring and a cash payment?

No. If you exclude yourself, you are telling the Court that you don't want to be part of the Settlement. The only way to obtain settlement benefits including Medical Data Monitoring services and a cash payment is to remain a Settlement Class Member and submit a valid Claim Form.

# 28. If I do not exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants and Released Parties for the claims that this Settlement resolves. You must exclude yourself from this Action to start or continue your own lawsuit or be part of any other lawsuit against the Defendants or any of the Released Parties. If you have a pending lawsuit, consult with your attorney in that case immediately.

# **OBJECT TO OR COMMENT ON THE SETTLEMENT**

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

If you do not exclude yourself from the Settlement Class, you can object to the Settlement if you do not agree with any part of it. You can give reasons why you think the Court should deny approval by submitting an objection. To object, you can do so in writing, in person, or through counsel, at your own

expense, at the Final Fairness Hearing.

If you object in writing, you must mail the objection before September 7, 2024, with the caption *In re: CentraState Healthcare Data Security Incident Litigation*, No: MON-L-504-23, and include: (i) your full name, current mailing address, telephone number, and email address; (ii) a concise statement for the reasons for your objection; and (iii) your signature.

The objection must be postmarked no later than September 7, 2024, and mailed first-class postage prepaid to the Settlement Administrator and Class Counsel at the following addresses:

Settlement Administrator	Class Counsel	Defendant's Counsel
CentraState Settlement, c/o A.B. Data, Ltd., P.O. Box 170800, Milwaukee, WI 53217	James E. Cecchi Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. 5 Becker Farm Road Roseland, NJ 07068  Linda P. Nussbaum Nussbaum Law Group, P.C. 1133 Avenue of the Americas, 31st Floor New York, NY 10036  Todd S. Garber Finkelstein, Blankinship, Frei- Pearson & Garber, LLP One North Broadway Suite 900 White Plains, NY 10601	Casie D. Collignon BAKER & HOSTETLER LLP 1801 California Street Suite 4400 Denver, CO 80202

The Court will hear from any Class Member who attends the Final Fairness Hearing and asks to speak regarding his or her objection, regardless of whether they have complied with the above procedures.

Counsel for the Parties will submit the objections to the Court with the Final Approval Papers.

Class Counsel will file their request for attorneys' fees, reimbursement of litigation costs, and Service Award for the Class Representative with the Court, which will also be posted on the Settlement Website, at www.CentraStateSettlement.com.

## 30. What is the difference between objecting and requesting exclusion?

Objecting is informing the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (that is, do not exclude yourself). Requesting exclusion is informing the Court you do not want to be part of the Settlement Class or participate in the Settlement. If you exclude yourself, you cannot object to the Settlement.

## THE FINAL FAIRNESS HEARING

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

The Court will hold a Final Fairness Hearing on **September 27, 2024 at 8:30 a.m.** at the Monmouth County Courthouse, 71 Monument Park, Freehold, NJ 07728.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and decide whether to grant final approval of the Settlement, approve Class Counsel's application for attorneys' fees and expenses as well as service awards to the Class Representatives. If there are objections, the Court will consider them. The Court will also hear from people who have asked to speak at the hearing.

# 32. Do I have to come to the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file and mail an objection, you do not have to attend the hearing. As long as you file and mail your written objection on time and as set forth above, it will be considered by the Court.

# 33. May I speak at the Final Fairness Hearing?

Yes. The Court will hear from any Class Member who attends the Fairness Hearing and asks to speak regarding his or her objection.

If you filed an objection, you should indicate whether you intend to appear in your objection (see Question 29). Your objection should state whether it is your intention to appear at the Final Fairness Hearing and should identify any witnesses you may call to testify or exhibits you intend to introduce into evidence at the Final Fairness Hearing. If you plan to have your attorney speak for you at the Final Fairness Hearing, your objection should also include your attorney's name, address, and phone number.

## IF YOU DO NOTHING

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

If you are a Settlement Class Member and you do nothing, you will remain a member of the Settlement Class but will not receive any Settlement benefits. You will also give up rights explained in Questions 15 and 16, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or any of the Released Parties about the legal issues in this Action and released by the Settlement Agreement.

## **GETTING MORE INFORMATION**

## 35. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement itself. The Settlement Agreement and other related documents are available at <a href="https://www.CentraStateSettlement.com">www.CentraStateSettlement.com</a> or by writing to the Settlement Administrator at: CentraState Settlement, c/o A.B. Data, Ltd., P.O. Box 170800, Milwaukee, WI 53217. Publicly-filed documents can also be obtained by visiting the office of the Clerk of the Monmouth County Courthouse or reviewing the Court's online docket.

If you have questions, you may call the toll-free number at 1-877-411-4707.

# PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE. THE COURT CANNOT ANSWER ANY QUESTIONS.