

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

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.*

**UNDER THIS SETTLEMENT YOU MAY BE ENTITLED TO A PAYMENT
OF AT LEAST \$50**

This Notice summarizes the proposed Settlement reached in a class action lawsuit entitled *Celeste Brown and Ross Finesmith v. AllCare Plus Pharmacy LLC*, Civil Docket No. 2484CV02366, in the Suffolk County Superior Court, Commonwealth of Massachusetts (“Lawsuit”) and you may be eligible to receive benefits including a payment of \$50 or free credit reporting provided by IDX and other relief. For more details about the Settlement, please visit www.AllCareSettlement.com or contact the Claims Administrator via email at AllCareSettlement@AtticusAdmin.com or call 1-800-355-1535.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO
INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

**This Notice explains the nature of the Lawsuit and claims being settled, your legal rights,
and the benefits to the Settlement Class.**

This Notice may affect your rights – please read it carefully.

- The Lawsuit alleges that around June 21, 2022, AllCare Plus Pharmacy LLC, (“AllCare”) became aware that cybercriminals had breached its computer system using phishing emails that targeted the email mailboxes of AllCare’s employees. After a reasonable investigation, AllCare determined that a single mailbox was compromised and certain information was subject to access without authorization and taken from AllCare’s systems. The potentially affected information varied by individual, but included some or all of the following categories of information: names, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information, health information, health insurance information, and information about treatments and prescriptions. AllCare maintains that it had meritorious defenses, and it was prepared to vigorously defend the Lawsuit. The Settlement is not an admission of wrongdoing or an indication that AllCare has violated any laws, but rather the resolution of disputed claims.
- If you received this Notice, you have been identified as a Settlement Class Member. More specifically, you are a Settlement Class Member because you have been identified as an individual impacted by the Data Security Incident.
- All Settlement Class Members may be eligible to receive certain benefits from the Settlement: (1) reimbursement for up to \$750 for documented out-of-pocket expenses such as fees for credit reports, credit monitoring, or other identity theft protection insurance products, (2) reimbursement for up to five (5) hours of documented Lost Time spent dealing with the Data Security Incident (\$20 per hour), (3) reimbursement for documented Extraordinary Losses, not to exceed \$5,000 per Settlement Class Member, for proven actual monetary losses, and (4) Settlement

Class Members can elect to enroll in two years of Credit Monitoring Services, **at no cost to you**, provided through IDX with at least \$1,000,000 in identity theft protection insurance. In the alternative to a claim for Ordinary Losses and Lost Time, Extraordinary Losses, and/or Credit Monitoring (i.e., 1 – 4 above), Settlement Class Members can elect to receive a \$50.00 Alternative Cash Payment.

The deadline to submit a claim is July 3, 2025.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim	You must submit a valid claim to get money from this Settlement. Claim Forms must be submitted online or postmarked for mail no later than July 3, 2025 .
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue and you will not get any money or credit monitoring.
Exclude Yourself	Opt out of the Settlement. Receive no money. Keep your rights. This is the only option that allows you to keep your right to sue for the claims in this Lawsuit. You will not receive any money or credit monitoring from the Settlement. Your request to exclude yourself must be submitted online or postmarked for mail no later than July 3, 2025 .
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than July 3, 2025 .
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 Approval Hearing is scheduled for August 27, 2025, at 2 p.m. (EDT) at 3 Pemberton Square, Boston, MA 02108, Suffolk Superior Court, Courtroom 1015.

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BASIC INFORMATION

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

You are a Settlement Class Member if you were among the individuals impacted by the Data Security Incident.

The Settlement Class specifically excludes: (i) AllCare; (ii) the Related Entities; (iii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iv) any judges assigned to this case and their staff and family; and (v) 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 associated with the Data Security 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 *Celeste Brown and Ross Finesmith v. AllCare Plus Pharmacy LLC*, Civil Docket No. 2484CV02366, in the Suffolk County Superior Court, Commonwealth of Massachusetts. The people who sued are called the “Plaintiffs” and the company they sued, AllCare, is known as the “Defendant” in this case and for purposes of this Notice.

The Lawsuit alleges that around June 21, 2022, AllCare Plus Pharmacy LLC, (“AllCare”) became aware that cybercriminals had breached its computer system using phishing emails that targeted the email mailboxes of AllCare’s employees. After a reasonable investigation, AllCare determined that a single mailbox was compromised and certain information was subject to access without authorization and taken from AllCare’s systems. The potentially affected information varied by individual, but included some or all of the following categories of information: names, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information, health information, health insurance information, and information about treatments and prescriptions. AllCare maintains that it had meritorious defenses, and it was prepared to vigorously defend the Lawsuit. The Settlement is not an admission of wrongdoing or an indication that AllCare has violated any laws, but rather the resolution of disputed claims.

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, in the best interests for 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.AllCareSettlement.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.”

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

You are included in the Settlement if you were among the individuals impacted by the Data Security Incident. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.AllCareSettlement.com, call toll-free at 1-800-355-1535, or write to the Claims Administrator at AllCare Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

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

Ordinary Loss Expense Reimbursement: All Settlement Class Members who submit a valid claim using the Claim Form are eligible for up to \$750 per Settlement Class Member with supporting documentation. Ordinary Losses include, without limitation and by way of example, unreimbursed losses relating to fraud or identity theft, professional fees including attorneys’ fees, accountants’ fees, and fees for credit repair services; and/or credit monitoring costs and miscellaneous expenses such as fax, postage, copying, and mileage that were incurred on or after the Data Security Incident (around June 21, 2022) and were more likely than not caused by the Data Security Incident. To receive reimbursement for any of the above-referenced documented Ordinary Loss Expenses, Settlement Class Members must submit a valid and timely Claim Form, signed under penalty of perjury and supporting third-party documentation for each item of expenditure claimed, to the Claims Administrator.

Lost Time Reimbursement: Settlement Class Members are eligible to receive \$20 per hour for up to five (5) hours of time actually spent responding to issues raised by the Data Security Incident, documented Lost Time spent dealing with the Data Security Incident (calculated at the rate of \$20 per hour for a maximum of \$100). Settlement Class Members must include on the Claim Form an attestation affirming the time spent and a written description of how the time was spent related to the Data Security Incident. Payment for Lost Time will be included in the per person cap for reimbursement of Ordinary and Extraordinary Losses, as applicable. Please note, the five (5) hours total for Lost Time may not be submitted twice – i.e., for a claim of Ordinary Losses and a separate claim of Extraordinary Losses.

Extraordinary Loss Reimbursement: Settlement Class Members are also eligible to receive up to \$5,000 per person for documented Extraordinary Losses. The loss must be an actual documented and unreimbursed monetary loss that was more likely than not caused by the Data Security Incident; and was incurred after June 21, 2022.

Credit Monitoring: Settlement Class Members shall be offered an opportunity to enroll in two years of *free* Credit Monitoring and Identity Theft Protection Services provided through IDX with at least \$1,000,000 in identity theft protection insurance.

Alternative Cash Payment: In the alternative to a claim for Ordinary Losses and Lost Time, Extraordinary Losses, and/or Credit Monitoring (i.e., all of the reimbursement categories defined above), Settlement Class Members can elect a \$50.00 Alternative Cash Payment.

Remedial Relief: Defendant has made certain security changes in response to the Data Security Incident. Defendant will continue those security changes and will pay for those changes separate and apart from other settlement benefits.

7. How to submit a claim?

All claims will be reviewed by the Claims Administrator for completeness and plausibility. You must file a Claim Form to receive money from the proposed Settlement. Claim Forms must be submitted online by July 3, 2025 or postmarked no later than July 3, 2025. You can submit an online claim or download a Claim Form at www.AllCareSettlement.com, or you can call the Claims Administrator toll-free at 1-800-355-1535 for a Claim Form.

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 AllCare, its Related Entities, or any of its past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of its respective predecessors, successors, assigns, owners, directors, shareholders, members, officers, executives, employees, principals, agents, attorneys, insurers, and reinsurers (collectively, the “Released Persons”) regarding the claims in this case.

The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Persons, is available at www.AllCareSettlement.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, you give up the right to sue for the claims in this case.

9. Will the Class Representative receive compensation?

Yes. The Class Representatives will each receive a Service Award of up to \$2,500, to compensate for their services 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 complete and submit an **Opt-Out Request Form** available at www.AllCareSettlement.com. You can submit your request:

- **Online** at www.AllCareSettlement.com or
- **By mail** to:

AllCare Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

Your request must be **submitted online or postmarked by July 3, 2025**.

If you opt out, you will not receive any Settlement benefits but will retain your right to pursue claims separately.

For more details, visit www.AllCareSettlement.com.

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 Released Persons (listed in Question 8) for the 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 money or Credit Monitoring Services from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed STRAUSS BORRELLI PLLC (called “Settlement 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?

Settlement Class Counsel will apply to the Court for an award of combined attorneys’ fees and costs in an amount not to exceed \$185,000. A copy of Class Counsel’s Motion for Attorneys’ Fees, Costs, Expenses, and Service Award for Class Representative will be posted on the Settlement Website, www.AllCareSettlement.com, before the Final Approval Hearing. The Court will make

the final decisions as to the amounts to be paid to Settlement Class Counsel and may award less than the amount requested by Settlement 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 must submit a timely and valid written notice of your objection no later than July 3, 2025.

Your notice of objection must include:

- a) your full name, current address, telephone number, and email address (if any);
- b) your signature;
- c) proof that you are a Settlement Class Member (e.g., copy of the Notice or copy of original notice of the Data Security Incident);
- d) all grounds for the objection, including any legal support for the objection that the objector believes applicable the identity of any attorneys representing you;
- e) the identity of all counsel representing you;
- f) a statement as to whether you or your counsel intend to appear at the Final Approval Hearing, and;
- g) the signature of your attorney or other duly authorized representative (if any), along with documentation setting forth such representation.

To be timely, an Objection must be filed with the Clerk of Court at the address below or submitted to the Claims Administrator by mail, hand-delivery, or through the Settlement Website by the Objection Deadline of July 3, 2025.

<p style="text-align: center;">CLERK OF COURT</p> <p style="text-align: center;">Suffolk County Superior Court Commonwealth of MA Civil Clerk’s Office 3 Pemberton Square Boston, MA 02108</p>	<p style="text-align: center;">CLAIMS ADMINISTRATOR</p> <p style="text-align: center;"><u>Mail:</u> AllCare Settlement c/o Atticus Administration PO Box 64053 St. Paul, MN 55164</p> <p style="text-align: center;"><u>Hand Delivery:</u> Atticus Administration LLC 1295 Northland Drive, Suite 160 St. Paul, MN 55120</p> <p style="text-align: center;"><u>Settlement Website:</u> www.AllCareSettlement.com</p>
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If you do not submit your Objection by July 3, 2025, you will be considered to have waived all Objections.

If you object, you are not required to attend the Final Approval Hearing, but may do so at your own expense. If you intend to appear at the Final Approval Hearing through counsel, your attorney(s) must file a notice of appearance in compliance with the Court's requirements.

If you intend to request permission from the Court to call witnesses at the Final Approval Hearing, you must provide reasonable notice to the Court and Counsel for all Parties.

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 Settlement 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 APPROVAL HEARING

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

The Court will hold the Final Approval Hearing on August 27, 2025, at 2 p.m. (EDT), 3 Pemberton Square, Boston, MA 02108, Suffolk Superior Court, Courtroom 1015. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check www.AllCareSettlement.com for updated information.

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 finally 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 Settlement Class Counsel and the request for a Service Award to the Class Representatives.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Approval Hearing. However, you are welcome to attend the hearing 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 Approval Hearing, but that is not necessary. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

19. May I speak at the hearing?

Yes. You can speak at the Final Approval Hearing, but you must ask the Court for permission.

DO NOTHING

20. What happens if I do nothing?

If you do nothing, you will not get any money from the Settlement, you will not be able to sue for the claims in this case, and you release the claims against Defendant and the Released Persons described in Question No. 8.

GET MORE INFORMATION

21. 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, Settlement Class Counsel's Motion for Attorneys' Fees, Costs, Expenses, and Service Award for Class Representatives, and more, please visit www.AllCareSettlement.com or call 1-800-355-1535. You may also contact the Claims Administrator at AllCare Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164.

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