

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Plymouth County Superior Court for the Commonwealth of Massachusetts
Howard, et al. v. Brockton Neighborhood Health Center, Inc., Case No. 2483-cv-01076

If your Private Information was impacted by the Brockton Neighborhood Health Center Data Incident on or around November 1 to November 3, 2024, 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 Brockton Neighborhood Health Center, Inc. (“Brockton” or “Defendant”) in a class action lawsuit about a cyberattack on the Defendant’s network and systems between November 1 and November 3, 2024, which may have impacted the Private Information of current and former patients (the “Data Incident”). The Plaintiffs allege claims of negligence, breach of implied contract, invasion of privacy, and unjust enrichment. The Defendant denies all allegations and any wrongdoing.
- The Settlement Class consists of all individuals residing in the United States whose Private Information was impacted in the Data Incident affecting Brockton in or around November 2024, including all those who received notice of the Data Incident.
- If approved by the Court, the Defendant will pay up to \$825,000 (the “Settlement Amount”) to pay for Valid Claims for Settlement Benefits (up to \$2,500 per Settlement Class Member) including: reimbursement for documented losses (up to \$2,500), compensation for up to three hours for lost time spent having to respond to the Data Incident (at \$30 per hour, up to \$90 in total), an alternative cash payment (up to \$50), and three (3) years of credit monitoring. The Settlement Amount will also cover Notice and Administration Expenses and any Court-approved attorneys’ fees, costs, and Service Awards.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive Settlement Benefits is to submit a valid and timely Claim Form.	December 8, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	You may object to the Settlement and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for Settlement Benefits.	November 9, 2026
DO NOTHING	If you do nothing, you will not get any Settlement Benefits and you give up the right to sue the Defendant about the 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 must decide whether to approve the Settlement.

Questions? Call (833) 930-0149 or visit www.BNHDataSettlement.com.

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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 called *Howard, et al. v. Brockton Neighborhood Health Center, Inc.*, Case No. 2483-cv-01076 pending in the Plymouth County Superior Court for the Commonwealth of Massachusetts. The people who filed this Action are called the “Plaintiffs” and the entity they sued, Brockton Neighborhood Health Center, Inc. (“Brockton”), is called the “Defendant.”

2. What is this Action about?

Between November 1 and November 3, 2024, the Defendant was impacted by a cybersecurity incident on the Defendant’s network and systems on or around November 1 to November 3, 2024, which may have impacted the Private Information of current and former patients (the “Data Incident”). Private Information means any information that could be used to identify, locate, or contact a person (whether on its own or in combination with other information). On or around December, 2024, the Defendant began notifying potentially impacted individuals about the Data Incident. The Plaintiffs assert claims for negligence, breach of implied contract, invasion of privacy, and unjust enrichment. The Defendant denies all of the Plaintiffs’ claims and maintains that they 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 “Settlement 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 a settlement. In this Settlement, the Settlement Class Representatives are Barbara Howard, Brandi Freeman, Tiffany Marks, I.M., a minor by and through his or her legal guardian, Tiffany Marks, and Felicia Stanley.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that they have not violated any laws. The Plaintiffs and 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 Settlement Benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members as “Settlement Class Counsel,” believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals residing in the United States whose Private Information was impacted in the Data Incident affecting Brockton in or around November 2024, including all those who received notice of the Data Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) Defendant; (ii) any judges assigned to this case and their staff and family; and (iii) 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 occurrence of the Data Incident or who pleads *nolo contendere* to any such charge.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If approved by the Court, the Defendant will pay up to \$825,000 (the “Settlement Amount”) to cover all Valid Claims for Settlement Benefits (up to \$2,500 per Settlement Class Member), Notice and Administrative Expenses, and any Court-approved attorneys’ fees, costs, and Service Awards.

The Settlement will provide cash payments and three (3) years of Credit Monitoring Services to Settlement Class Members who submit a timely Valid Claim.

Participating Settlement Class Members may submit a claim for monetary benefits for either:

- Reimbursement for **Documented Losses** of up to \$2,500 in unreimbursed monetary losses that were actually incurred or spent because of the Data Incident between November 1, 2024 and December 8, 2026 and/or compensation for up to three hours for **Lost Time** spent having to respond to the Data Incident (at \$30 per hour, up to \$90).

OR

- An **Alternative Cash Payment** of up to \$50.

In addition, all Participating Settlement Class Members will be offered an opportunity to enroll in three (3) years of Credit Monitoring Services.

Settlement Benefits may be reduced *pro rata* (proportionally) based on the amount of Valid Claims (see Question 12).

8. Tell me more about the reimbursement for Documented Losses.

Participating Settlement Class Members can claim up to \$2,500 for any unreimbursed monetary losses that were actually incurred or spent because of the Data Incident between November 1, 2024 and December 8, 2026.

Documented Losses include, but are not limited to unreimbursed losses associated with identity theft or fraud where an unauthorized individual diverted, debited, withdrew, or otherwise conducted fraudulent operations to deprive the Claimant of actual money. At the time you submit your Claim, the Documented Losses must remain unreimbursed, have been denied for reimbursement, and are not part of a pending request for reimbursement by a third party, such as a financial institution. Under the Settlement, you cannot be reimbursed for losses if you have already been reimbursed for the same Documented Losses by another source.

To receive reimbursement for Documented Losses you must submit third-party documentation supporting your claims. This can include receipts or other documentation not “self-prepared” that document the costs incurred. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation.

9. Tell me more about the compensation for Lost Time.

In addition to reimbursement for Documented Losses and Credit Monitoring Services, Participating Settlement Class Members can claim compensation for up to three (3) hours—at a rate of \$30 per hour—for lost time spent responding to the Data Incident. Claims for lost time are subject to the \$2,500 limit on Documented Losses. No supporting documentation is required, but you must attest under penalty of perjury on the Claim Form that you spent the claimed amount of time responding to the Data Incident.

10. Tell me more about the Alternative Cash Payment.

As an alternative to claiming compensation for Documented Losses (including Lost Time), Participating Settlement Class Members may claim an Alternative Cash Payment of up to \$50 per person. The amount of this cash payment may be adjusted *pro rata* (proportionally) based on the amount of Valid Claims (see Question 12). To receive this benefit, you must submit a valid Claim Form, but no supporting documentation is required.

11. Tell me more about the Credit Monitoring Services.

All Participating Settlement Class Members will be offered an opportunity to enroll in Credit Monitoring Services, which will include three (3) years of one-bureau credit monitoring and \$1 million in identity theft protection insurance, among other features. If you submit a Valid Claim for Credit Monitoring Services, you will receive an activation code and instructions on how to enroll after the Court grants final approval of the Settlement.

12. How will Settlement Benefits be calculated?

After deducting the costs of the Notice and Administrative Expenses and attorneys' fees, costs, and expenses of Class Counsel and Service Awards from the Settlement Amount, the remaining balance will be used to pay Valid Claims for Settlement Benefits as follows: the total cost of Valid Claims for Credit Monitoring Services, followed by Valid Claims for Documented Losses, followed by Valid Claims for Lost Time, followed by Valid Claims for Alternative Cash Payment. Valid Claims for Settlement Benefits will be reduced *pro rata* so that the total amount paid will not exceed the Settlement Amount.

HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM

13. How do I submit a Claim Form to get Settlement Benefits?

You must submit a Claim Form by **December 8, 2026** to receive Settlement Benefits. Claim Forms must be submitted, with any necessary supporting documentation, online on the Settlement Website at **www.BNHDataSettlement.com** or by mail, postmarked by **December 8, 2026**, to the Settlement Administrator at:

Settlement Administrator - 83452
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

14. What if I am submitting a Claim Form for a minor or someone who is deceased?

If you are submitting a Claim Form for a minor or a deceased Settlement Class Member, you must be an authorized representative, guardian, executor, administrator, or other legal representative of the Settlement Class Member. You will need to provide supporting documentation with the Claim Form that demonstrates your authority to act on behalf of the Settlement Class Member such as a birth certificate, guardianship papers, power of attorney, or other applicable legal documentation.

15. When will I get Settlement Benefits?

The short answer is – after the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **January 12, 2026**, to decide whether to approve the Settlement, Class Counsel's request for attorneys' fees, expenses, and costs, and the Service Award to the Settlement 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 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

16. Do I have a lawyer in this case?

Yes, the Court appointed Nickolas J. Hagman of Cafferty Clobes Meriwether & Sprengel, LLP, David Lietz of Milberg, PLLC Jeffrey Ostrow of Kopelowitz Ostrow, P.A., and Leigh S. Montgomery of Ellzey Kherkher Sanford Montgomery, LLP to represent you and other members of the Settlement Class as Settlement Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Amount (subject to Court approval).

Questions? Call (833) 930-0149 or visit www.BNHDataSettlement.com.

17. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will the lawyers be paid?

Settlement Class Counsel will ask the Court to approve attorneys' fees, costs, and expenses of up to \$322,500, as well as a \$2,000 Service Award to each of the Settlement Class Representatives. If approved, these amounts will be paid from the Settlement Amount before providing benefits to Settlement Class Members who submit Valid Claims.

OBJECTING TO THE SETTLEMENT

19. 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 Benefits, request for attorneys' fees, costs and expenses, or Service Awards, 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.

To be considered by the Court, your written notice of objection must include:

- Your full name, address, telephone number, and email address (if any);
- The case name and case number, *Howard, et al. v. Brockton Neighborhood Health Center, Inc.*, Case No. 2483-cv-01076;
- Information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class (e.g., a copy of the original notice of the Data Incident or a statement explaining why you believe you are a Settlement Class Member);
- A written statement of all grounds for the objection, accompanied by any legal support for the objection you believe applicable;
- The identity of all counsel representing you in connection with the objection;
- A statement of whether you and/or your counsel will personally appear at the Final Approval Hearing; and
- Your signature or the signature of your duly authorized attorney or other duly authorized representative.

Objections must be mailed to Settlement Class Counsel and counsel for Defendant at the addresses below, postmarked no later than **November 9, 2026**.

CLASS COUNSEL	COUNSEL FOR DEFENDANT
Nickolas J. Hagman CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP 135 S. LaSalle, Suite 3210 Chicago, IL 60603 David K. Lietz MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC 5335 Wisconsin Ave., NW, Suite 440 Washington, DC 20015 Jeff Ostrow KOPELOWITZ OSTROW FERGUSON WEISELBERG GILBERT	Brian J. Palmeri WINGET SPADAFORA & SCHWARTZBERG, LLP 2187 Atlantic Street, Suite 701 Stamford, CT 06902

Questions? Call (833) 930-0149 or visit www.BNHDataSettlement.com.

CLASS COUNSEL	COUNSEL FOR DEFENDANT
One West Las Olas Blvd., Suite 500 Fort Lauderdale, FL 33301 Leigh S. Montgomery ELLZEY KHERKHER SANFORD MONTGOMERY, LLP 4200 Montrose Blvd., Ste. 200 Houston, TX 77006	

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 **January 12, 2027 at 2:00 p.m. ET**, at Plymouth County Superior Courthouse, 52 Obery St., Suite 2041, Plymouth, MA 02360 to decide whether to approve the Settlement, Class Counsel's request for up to \$322,500 for attorneys' fees, costs, and expenses, and a \$2,000 Service Award for each of the Settlement Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.BNHDDataSettlement.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 will not be eligible to receive any Settlement Benefits.

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.BNHDDataSettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by telephone at (833) 930-0149, or by mail at:

Settlement Administrator - 83452
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150- 5391