

In re Community Dental Care
Case No. 62-CV-25-2490

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE
DECEMBER 2024 COMMUNITY DENTAL CARE DATA BREACH,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR
RIGHTS, AND MAY ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

A court has authorized this notice. This is not a solicitation from a lawyer.

You are not being sued.

Please read this Notice carefully and completely.

- A Settlement has been reached with Community Dental Care (“CD” or “Defendant”), a Minnesota-based nonprofit dental services provider, in a class action lawsuit. This case is about the targeted cyberattack on CD's computer systems that occurred in December 2024 (the “Data Breach”). Certain files that contained private information were allegedly accessed by an unauthorized actor. These files may have contained personal information such as names; health insurance information; dates of birth; medical information; and Social Security numbers.
- The lawsuit is called *In re Community Dental Care*, Case No. 62-CV-25-2490. It is pending in the District Court for Ramsey County, Minnesota (the “Litigation”).
- CD denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- If you received a postcard notifying you of this Settlement, CD's records indicate that you are a Class Member, and may be entitled to one or more benefits under the Settlement. You may have received a previous notice directly from CD.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***



SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.CDDataBreach.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.	October 19, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or 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.	September 24, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A 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.	September 24, 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 or payments 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.
- The Court in charge of this case still has to decide whether to approve the Settlement. Benefits will be provided only after any issues with the Settlement are resolved. Please be patient.
- No opinion concerning the tax consequences of this Settlement to any Settlement Class Member is given or will be given by Defendant, Defense Counsel, or Proposed Class Counsel, nor is any Party or his/her/its counsel providing any representation or guarantee respecting the tax consequences of the Settlement as to any Settlement Class Member. Settlement Class Members should consult their own tax advisors regarding the tax consequences of the Settlement and any tax reporting obligations with respect thereto. Each Settlement Class Member is responsible for his/her taxes or tax reporting and other obligations respecting the Settlement, if any.



WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
WHO IS IN THE SETTLEMENT	4
THE SETTLEMENT BENEFITS.....	4
SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS	6
THE LAWYERS REPRESENTING YOU	6
EXCLUDING YOURSELF FROM THE SETTLEMENT	7
COMMENTING ON OR OBJECTING TO THE SETTLEMENT.....	7
THE COURT’S FINAL APPROVAL HEARING	8
IF I DO NOTHING	9
GETTING MORE INFORMATION	9

Basic Information

1. Why was this Notice issued?

The District Court for Ramsey County, Minnesota, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *In re Community Dental Care*, Case No. 62-CV-25-2490. It is pending in the District Court for Ramsey County, Minnesota. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Community Dental Care, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the December 2024 targeted cyberattack on CD's computer systems, certain files that contained private information were accessed by an unauthorized actor. These files may have contained personal information such as names; health insurance information; dates of birth; medical information; and Social Security numbers.

CD denies the allegations, and denies that it violated any laws or harmed any persons. By agreeing to settle, CD is not admitting liability on any of the factual allegations or claims in the lawsuit, or that the case can or should proceed as a class action. More information about the lawsuit and CD’s position can be found on the Settlement Website in the “Court Documents” section.

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 from the settlement. In this Settlement, the Class Representatives are Tracy Knight; Aaron Brown (on behalf of minor child A.B.); Tina Ihrke; Sheila Schutz; Danelle Whittaker; Kathy McKenzie; Keiryn Kuehn

(on behalf of minor children H.K. and M.D.); and Ka Vang. 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. By preliminarily approving the Settlement and issuing this notice, the Court is not suggesting which side would win or lose if the case went to trial. Both sides have agreed to a Settlement to avoid the costs and risks of litigation and a trial. The Settlement is not an admission of wrongdoing by CD. The Plaintiffs and their attorneys think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: “All individuals whose Personal Information was accessed without authorization in the Data Breach, including all those who received a notice of the Data Breach.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) CD and its officers, directors, and related companies; (2) governmental entities; (3) the Judge in this case, and the Judge’s family and staff; and (4) anyone who perpetrated the Data Security Incident.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@CDDataBreach.com
- Call toll free, 24/7: (866) 675-2314
- By mail: CD Data Breach Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

CD has agreed to pay for a number of Class benefits, which are explained below. All Class Members may enroll in two years of **Medical and Credit Monitoring** from CyEx Medical Shield Pro, and may claim **one** of two **cash payment** options.

MEDICAL AND CREDIT MONITORING. All Class Members are eligible to enroll in two years of CyEx Medical Shield Complete. Enrollment codes have been sent to all Class Members by postcard. If you no longer have your enrollment code, please contact the Administrator.



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
- 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.

CASH PAYMENT OPTIONS

Cash Payment A – Documented Losses. If you incurred actual, unreimbursed, documentarily provable out-of-pocket losses arising from and actually caused by the Data Breach, you may seek to get back up to **\$5,000.00**. The losses must have occurred between December 20, 2024, and **October 19, 2026**.

This benefit covers monetary, out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail

This benefit does not cover claims for lost time or other non-monetary losses. You need to send proof that supports your claimed unreimbursed expenses, like bank statements or receipts, to show when the loss occurred and how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those self-prepared notes or papers alone are not enough to make a valid claim. Your proof or notes must show that your expenses were because of the Data Breach.

You cannot claim a payment for expenses that have already been reimbursed by a third party. If you make a claim for this benefit, you may not seek Cash Payment B - \$50.00 Alternative Cash Payment.

-OR-

Cash Payment B – Alternative Cash. *Instead a payment for documented losses,* you may claim a one-time **\$50.00** cash payment. 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@CDDDataBreach.com
- Call toll free, 24/7: (866) 675-2314
- By mail: CD Data Breach Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

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

If you stay in the class, you won't be able to be part of any other lawsuit against CD about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section XI) describes the legal

claims that you give up if you remain in the Class, so read it carefully. The Settlement Agreement is available at www.CDDataBreach.com. If you have any questions, you can talk for free to the attorneys identified below who have been appointed by the Court to represent the class, or you are welcome to talk to any other attorney of your choosing at your own expense.

Submitting a Claim Form for a Settlement Payment

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

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

CD Data Breach Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (866) 675-2314, by email info@CDDataBreach.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 **October 19, 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 **October 19, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 23, 2026** (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 Raina C. Borrelli of Strauss Borrelli PLLC; Christopher P. Renz of Chestnut Cambronne PA, to represent you and other Class Members ("Class Counsel").

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense, without any right to seek reimbursement of those costs from CD.

14. How will Class Counsel be paid?



Class Counsel will ask the court to approve \$400,000.00 as reasonable attorneys' fees and reimbursement of litigation costs. The amount determined by the court amount will be paid by CD.

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 by CD.

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 CD 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 **September 24, 2026**.

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

- (1) the name of the Litigation: *In re Community Dental Care*, Case No. 62-CV-25-2490, pending in the District Court for Ramsey County, Minnesota;
- (2) your full name, current 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:

CD Data Breach Settlement
ATTN: Exclusion Request
PO Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **September 24, 2026**.

Commenting on or Objecting to the Settlement

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

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for 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 in writing to consider your objection:

- (1) the name of the Litigation: *In re Community Dental Care*, Case No. 62-CV-25-2490, pending in the District Court for Ramsey County, Minnesota;
- (2) your full name, current mailing address, telephone number, and email address;
- (3) information that proves that you are a Class Member (such as a notice you have received);
- (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 or your lawyer have objected in any other cases in the past five years, list the names, courts, the orders ruling on your objections, and civil action numbers for each of those cases;
- (7) whether or not you or your lawyer would like to appear or speak at the Final Approval Hearing;
- (8) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both, with a summary of each witness's testimony;
- (9) your signature (if you have hired your own lawyer, their signature is not sufficient).

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 **September 24, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants by **September 24, 2026**.

Clerk of the Court	Settlement Administrator
Clerk of the Court District Court for Ramsey County 15 West Kellogg Boulevard St. Paul, MN 55102	CD Data Breach Settlement ATTN: Objections PO Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendant
Raina C. Borrelli Strauss Borrelli PLLC One Magnificent Mile 980 North Michigan Avenue, Suite 1610 Chicago, Illinois 60611 Christopher P. Renz Chestnut Cambronne PA 100 Washington Avenue South, Suite 1700 Minneapolis, Minnesota 55401	Anju Suresh Hinshaw & Culbertson LLP 250 Nicollet Mall, Suite 1150 Minneapolis, Minnesota 55401 David M. Schultz Margaret A. Hayes Hinshaw & Culbertson LLP 151 North Franklin Street, Suite 2500 Chicago, Illinois 60606

Any Class Member who fails to comply in full with the requirements for objecting waives the right to object or to be heard at the Final Approval Hearing and will be barred from making any objection to the Settlement and shall be bound by the terms of the Agreement, including the Release.

Plaintiffs or CD or both shall have the right, but not the obligation, to respond to any objection by filing a copy of the response with the Court, and serving a copy to the objector or their attorney.

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 on **November 23, 2026, at 11:00 AM Central Time**, via Zoom.

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 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.CDDataBreach.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 and meets the other criteria described in **Question 16**. 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 is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.CDDataBreach.com.

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

- Email: info@CDDataBreach.com
- Call toll free, 24/7: (866) 675-2314
- By mail: CD Data Breach Settlement
c/o Settlement Administrator
PO 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, **15 West Kellogg Boulevard, St. Paul, Minnesota 55102.**

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