

CIRCUIT COURT OF  
THE CITY OF ST. LOUIS, MISSOURI

**Notice of Class Action Settlement**

**If you received notice from Defendant that your personal information may have been compromised as a result of a Security Incident that occurred in October and November 2022, please read this notice.**

**The Circuit Court of the City of St. Louis, Missouri  
has preliminarily approved a class action settlement that may affect your legal rights.**

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

- A class action settlement has been reached in the case of *J.D., et al. v. Jefferson County Health Center d/b/a Jefferson County Health Department*, Case No. 2622-CC00457 pending in the Circuit Court of the City of St. Louis, Missouri.
- On September 10, 2026, the Court preliminarily approved this Settlement and certified this lawsuit to proceed as a class action for settlement purposes.
- If you received notice from Defendant that your personal information may have been compromised as a result of a Security Incident that occurred between October 31 and November, 15, 2022 at the Jefferson County Health Center, you are a member of the Settlement Class. Anyone who timely and validly requests exclusion from the class will be excluded from the Settlement Class.
- If you are a Class Member, then you may be entitled to compensation under the terms of a proposed settlement. If you are a Class Member and you wish to file a claim, object to the Settlement, or exclude yourself from the Settlement, you must do so following the procedures outlined in this notice.
- This notice is to advise you of the status of the lawsuit, the terms of the proposed Settlement, and your rights in connection with the proposed settlement. This is not a lawsuit against you. A copy of the Settlement Agreement may be found at [www.JeffersonCountyBreachSettlement.com](http://www.JeffersonCountyBreachSettlement.com). This notice only contains a summary of the Settlement Agreement.
- If the Court grants final approval, the Defendant will pay \$2,250,000.00 into a Settlement Fund to resolve the Released Claims of the Settlement Class. Class Members who submit valid claim forms are entitled to choose one of the following Settlement benefits: a Fixed Cash Payment of \$150.00 (no documentation is required) or Reimbursement of a maximum of \$300.00 for lost time and out-of-pocket expenses (supporting documentation is required). The final payment amounts will depend on the amount of fees, costs, and expenses associated with the Settlement and the number of valid claims filed.
- Your legal rights are affected whether you act or don't act. **Read this notice carefully.**

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT |                                                                                                                                                                                           |                    |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| ACTION                                        | EXPLANATION                                                                                                                                                                               | DUE DATE           |
| <b>DO NOTHING</b>                             | You will be included in the Settlement Class, but receive no benefits. You will be bound by the Court's judgment, and release claims against Defendant relating to the Security Incident. | <b>No deadline</b> |

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                          |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>SUBMIT A CLAIM FORM</b>                    | <p>Class Members can choose to submit a claim to receive Settlement benefits. For more information about submitting a claim, see question 7.</p> <p>If you submit a valid claim form, assuming the Court approves the Settlement, you will receive a Participating Class Member Payment. You will be bound by the Court's judgment and release claims against Defendant relating to the Security Incident.</p>                                                                                                                                                                                                                                                                                  | <b>November 16, 2026</b> |
| <b>ASK TO BE EXCLUDED</b>                     | <p>If you choose to exclude yourself (opt out), you will <b>not</b> be included in the Settlement. You will receive no benefits and you will not release any claims you may have against Defendant relating to the Security Incident.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>November 16, 2026</b> |
| <b>OBJECT</b>                                 | <p>If you wish to object to the Settlement, you must file your objection in writing with the Clerk of the Court, and send a copy of your objection to the attorneys for all Parties. If you exclude yourself from the Settlement, you cannot file an objection. Class Members who do not timely make their objections in this manner will be deemed to have waived all objections and shall not be heard or have the right to appeal approval of the Settlement. If you file an objection, <b><u>you must also appear</u></b> at the Fairness Hearing, in-person or through counsel, to show cause of why the proposed Settlement should not be approved as fair, reasonable, and adequate.</p> | <b>November 16, 2026</b> |

## BASIC INFORMATION

### 1. Why did I receive notice of this litigation?

You received notice of this case because records show that you received notice from the Jefferson County Health Center that your personal information may have been compromised as a result of the Security Incident that occurred between October 31 and November 15, 2022. If these records are correct, you are a Class Member, and you are entitled to receive Settlement benefits if you submit a valid claim form to the Settlement Administrator before the deadline and if the Court grants final approval of the Settlement. You also have other options as described in this notice.

### 2. What is a class action and who is involved?

In a class action lawsuit, one or more people called "class representatives" sue on behalf of other people who have similar claims. The people together are a "class." The class representatives who sue—and all the class members like them—are called plaintiffs. The entity they sued (in this case, the Jefferson County Health Center d/b/a Jefferson County Health Department) is called the Defendant. One court resolves the issues for everyone who does not exclude himself/herself.

### 3. Why is this lawsuit a class action?

The Court decided that this lawsuit can proceed as a class action because it meets the requirements of Missouri Supreme Court Rule 52.08. Specifically, the Court found that there are a sufficient number of people who were affected by the Security Incident at issue in this case, that there are legal questions common to each of them, that Class Representatives will fairly and adequately represent the Settlement Class's interests; and that this class action will be more efficient than having many individual lawsuits.

#### **4. What is this lawsuit about?**

The Class Representatives filed a Petition against Defendant, which were consolidated into a single case. The Petition alleges that Defendant acted unlawfully by failing to prevent the Security Incident. The Class Members claimed that Defendant failed to fulfill its legal duty to adequately secure and safeguard the information of the Class Representatives and Class Members and that Defendant breached promises made to the Class Representatives and Class Members concerning the security of their data.

Defendant has denied and continues to deny the allegations asserted by the Class Representatives in the Consolidated Action and contends that Defendant was and is in compliance with applicable state and federal law. The Court has not made any ruling on the merits of this case. To resolve this matter without the expense, delay, and uncertainties of continued litigation, the Parties have reached a Settlement, which resolves all claims against Defendant. The Settlement is not an admission of wrongdoing by Defendant and does not imply that there has been, or would be, any finding that Defendant violated the law. The Court has already preliminarily approved the Settlement. Nevertheless, because the settlement of a class action determines the rights of all members of the class, the Court overseeing this lawsuit must give final approval to the Settlement before it can be effective. The Court has certified the Settlement Class for settlement purposes only and subject to final approval of the Settlement, so that members of the Settlement Class can be given this notice and the opportunity to submit a claim form, to object to the Settlement, or to exclude themselves from the Settlement Class. If the Court does not grant final approval of the Settlement, the Settlement will be void, and the lawsuit will proceed as if there had been no settlement and no certification of the Settlement Class.

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

The following Settlement Class has been certified by the Court: The Missouri residents who utilized the Health Center's services and whose protected health information was compromised in the breach that was discovered on or about November 15, 2022. You will be considered a member of the Settlement Class unless you timely file a valid exclusion statement.

### **YOUR RIGHTS AND OPTIONS**

#### **6. What does the Settlement provide?**

If the Court grants final approval, Class Members who submit valid claim forms are entitled to choose one of the following Settlement benefits:

- a. Fixed cash payment option. Class Members who submit a valid claim form may elect to receive a payment of \$150.00 by selecting the "Fixed Cash Payment" option on the claim form; or,
- b. Reimbursement for lost time and out-of-pocket expenses option. In lieu of receiving the Fixed Cash Payment option, Class Members may seek compensation for their lost time and out-of-pocket expenses by selecting the "Reimbursement" option on the claim form. Each Class Member who selects the Reimbursement option is eligible to seek up to a maximum of \$300.00. Class Members that select the Reimbursement option must submit a valid claim form and supporting evidence of their lost time, out-of-pocket expenses, or other expenditures. The lost time, out-of-pocket expenses, or other expenditures include, but are not limited to, costs for fraud or identity protection, professional fees, credit repair services, and/or the time incurred dealing with the privacy breach at issue. The lost time and out-of-pocket expenses must have been incurred between the date of the notice of the breach by Defendant and the end of the Claims Deadline and have not yet been reimbursed by a third party or other source.

The amount you are entitled to receive depends on several factors, including how many valid claim forms are filed before the Claims Deadline. You can look at the claim form at <http://www.JeffersonCountyBreachSettlement.com/documents> to see an explanation of the types of loss that will be considered, as well as specific documentation requirements.

**Fees, Costs, and Expenses Associated with the Settlement:** The parties estimate that the fees, costs, and expenses associated with the Settlement will be as follows: (i) Settlement Administration Costs estimated to be \$150,000.00; (ii) a Fee Award, to be requested by Class Counsel, not to exceed 35% of the total Settlement amount, as well as Class Counsel's costs and expenses incurred in this case; and (iii) Service Awards to be requested by the Class Representatives in the amount of \$5,000.00 for each Class Representative.

For those Class Members entitled to a cash payment, the exact amount of such payment is unknown at this time and may vary depending on several factors, including the costs of the other expenses to be paid from the Settlement. The Settlement Administrator will calculate the final amount that is due to each eligible Participating Class Member and shall pay Settlement distributions directly to each eligible Class Member who timely returns a completed valid claim form and who does not actively remove himself or herself from the Settlement Class and who otherwise qualifies for the distribution.

## **7. How do I receive a benefit?**

If you are an eligible Class Member and you do not exclude yourself from the Settlement, and if you wish to receive a payment from the Settlement, then you must make a valid claim by **November 16, 2026**.

Claims can be filed online at <http://www.JeffersonCountyBreachSettlement.com> by **November 16, 2026** or by mailing your Claim Form to the Settlement Administrator, postmarked by the Claims Deadline, Settlement Administrator - 83479, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York NY 10150-5391. You may also contact the Settlement Administrator toll-free at (833) 453-3461 with any questions. Late claims for distribution will not be paid.

If the Settlement is approved by the Court after the Fairness Hearing, and if you have timely submitted a valid claim form for a Fixed Cash Payment or Reimbursement by the deadline of **November 16, 2026**, you will be sent a Participating Class Member Payment for your monetary share of the Settlement.

## **8. How will I receive a payment?**

The Settlement Administrator will issue a payment to each Class Member entitled to a Participating Class Member Payment following the final approval of the Settlement.

The Parties cannot predict exactly when (or whether) the Court will give final approval to the Settlement, so please be patient. However, if the Court finally approves the Settlement, you will be paid, if eligible, within approximately 60 calendar days after the Court finally approves the Settlement. If there is an appeal of the Settlement, payment may be delayed. Updated information about the case can be obtained through Class Counsel at the telephone number or email address provided below.

## **9. What happens if I do nothing at all?**

If the Court grants final approval of the Settlement, and you do nothing, then you will be bound by the Court's Final Judgment that will forever bar you from pursuing any claim against Defendant and the Released Parties related to the Security Incident that occurred in October and November 2022, and you will receive no payment from the Settlement Administrator.

## **10. Why would I ask to be excluded?**

If you already have your own lawsuit against Defendant about the same claims in this lawsuit and want to continue with it, you need to ask to be excluded from the Settlement Class. If you exclude yourself, you will not be legally bound by the Court's judgment in this case. If you start your own lawsuit against Defendant after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendant, you should talk to your own lawyer.

### 11. How do I ask the Court to exclude me in this case?

You have the right to exclude yourself from (i.e., “opt out” of) the Settlement Class. If you exclude yourself, you will be giving up the right to receive any payment and the right to object, but you will not be releasing the claims that are released in the Settlement.

To exclude yourself from the Settlement Class, you must inform the Settlement Administrator in writing of your name, address, and your intention to be excluded. The request for exclusion must contain the name, address, and telephone number of the Class Member to be valid. It must also contain the words: “I elect to exclude myself from the certified class in *J.D. and F.M. v. Jefferson County Health Center d/b/a Jefferson County Health Department*” and be signed in order to be valid. All requests for exclusion must be submitted, signed, and mailed to the Settlement Administrator and postmarked no later than **November 16, 2026**. If you return a late request for exclusion, the request will be deemed invalid, and you will remain a member of the Settlement Class and will be bound by all of the terms of the Settlement.

YOU CANNOT EXCLUDE YOURSELF BY TELEPHONE OR BY SENDING AN EMAIL.

DO NOT SUBMIT BOTH A CLAIM FORM AND A REQUEST FOR EXCLUSION. IF YOU SUBMIT BOTH A CLAIM FORM AND A REQUEST FOR EXCLUSION, YOUR CLAIM FORM WILL BE DISREGARDED.

### 12. How do I object to the settlement?

You have the right to object to the Settlement if you wish. To object, you must file a written statement with the Clerk of the Circuit Court of the City of St. Louis, 10 North Tucker Boulevard, St. Louis, Missouri 63101, no later than **November 16, 2026**. You must also mail a copy of your objection to the following three places postmarked no later than **November 16, 2026**:

| COURT                                                                                                     | CLASS COUNSEL                                                                 | DEFENDANT’S COUNSEL                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Clerk of the Court<br>City of St. Louis Circuit Court<br>10 North Tucker Boulevard<br>St. Louis, MO 63101 | Sander C. Sowers<br>Lear Werts LLP<br>103 Ripley Street<br>Columbia, MO 65201 | Rachel Rivers<br>Pierson Ferdinand<br>2100 Geng Road, Suite 210<br>Palo Alto, CA 94303<br><br>William Hellmich<br>Hellmich, Hill & Retter, LLC<br>1049 North Clay Avenue<br>Kirkwood, MO 63122 |

A copy of your objection must also be mailed or submitted through the Settlement Website to the Settlement Administrator at the following address: Settlement Administrator - 83479, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York NY 10150-5391.

Your objection must: (i) include your full name, address, email address, and telephone number; (ii) if represented by counsel, provide the name, address, e-mail address, and telephone number for such counsel; (iii) state the case name and number of this Consolidated Action; (iv) attach documents establishing or provide information sufficient to allow the Parties to confirm you are a Class Member; (v) include a statement of your specific objections; (vi) state all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials, papers, briefs, or other documents upon which the objection is based; (vii) identify any other objections you have filed, or have had filed on your behalf, in any other class action cases in the last four years; (viii) provide a list of witnesses you may call to testify and exhibits you intend to introduce as evidence at the Fairness Hearing; (ix) a statement whether the objector intends to appear at the Fairness Hearing, with or without counsel; and (x) be signed by you.

If you file an objection and wish it to be considered, you must also appear at the Fairness Hearing, which will be held on **December 10, 2026** at 9:00 a.m. at the Circuit Court of the City of St. Louis Courthouse, Division 17, 10 North Tucker Boulevard, St. Louis, Missouri 63101, in-person or through counsel to show cause of why the proposed Settlement should not be approved as fair, reasonable, and adequate.

You will not be excluded from the Settlement by filing an objection. If you exclude yourself from the Settlement or submit a valid claim form, you cannot file an objection.

Any attorney you may hire for the purpose of making an objection must file his or her Entry of Appearance on or before **November 16, 2026**. The Entry of Appearance shall be filed with the Clerk of the Court with a copy served upon Class Counsel and Defendant's Counsel in accordance with Missouri Supreme Court Rules.

Any Class Member who does not timely file and serve this written objection will not be permitted to raise an objection, except for good cause shown, and any Class Member who fails to object in the manner described above will be deemed to have waived objections to the claim and will be foreclosed from raising any objections.

#### THE LAWYERS REPRESENTING YOU

##### **13. Do I have a lawyer in this case?**

The Class Representatives and the Settlement Class are represented by both Class Counsel, Bradford B. Lear and Todd C. Werts of Lear Werts LLP, 103 Ripley Street, Columbia, Missouri 65201.

##### **14. Is there a release or waiver of claims?**

Yes. Unless you affirmatively exclude yourself, you will agree to the "Release" of claims as described in the Settlement Agreement. That means that you cannot sue, continue to sue, or be part of any other lawsuit against Defendant or other Released Parties for any of the Released Claims. It also means that the Court's orders will apply to you and legally bind you. You may view the Settlement Agreement for the full language of the claims you will give up if you remain in the Settlement by visiting [www.JeffersonCountyBreachSettlement.com](http://www.JeffersonCountyBreachSettlement.com) or requesting a copy from the Settlement Administrator.

#### THE COURT'S FINAL APPROVAL HEARING

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

The Court has already granted preliminary approval of the Settlement. The Court will hold a Fairness Hearing on **December 10, 2026** at 9:00 a.m. at the Circuit Court of the City of St. Louis Courthouse, Division 17, 10 North Tucker Boulevard, St. Louis, Missouri 63101. The Fairness Hearing may be continued to a future date without further notice. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider and rule on them. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the Settlement.

If the Court does not approve the Settlement, if it approves the Settlement and the approval is reversed on appeal, or if the Settlement does not become final for some other reason, you will not be paid at this time, and Class Members will receive no benefits from the Settlement. Plaintiffs, Defendant, and all of the Class Members will be in the same position as they were prior to the execution of the Settlement, and the Settlement will have no legal effect, no class will remain certified (subject to approval or otherwise), and the Plaintiffs and Defendant will continue to litigate the Consolidated Action. There can be no assurance that if the Settlement is not approved, the Settlement Class will recover more than is provided in the Settlement, or indeed, anything at all.

##### **16. Do I have to come to the hearing?**

No, unless you have filed an objection. Class Counsel will answer questions the Court may have. But you are welcome to come at your own expense. If you send an objection, you have to come to Court to talk about it. You may also pay your own lawyer to attend, but it's not necessary.

## MORE INFORMATION

### 17. Are more details available?

This notice summarizes the proposed Settlement. If you need more information or want to change your contact information, visit at [www.JeffersonCountyBreachSettlement.com](http://www.JeffersonCountyBreachSettlement.com) or call the Settlement Administrator toll-free at (833) 453-3461.

**Please do not contact the Court Clerk, the Judge, Defendant's Counsel, or Defendant; they are not in a position to give you any advice about the Settlement.**

### 18. What are the important deadlines?

The following are the important dates and deadlines under the proposed Settlement:

|                                           |                          |
|-------------------------------------------|--------------------------|
| Last Day to Submit Request for Exclusion: | <b>November 16, 2026</b> |
| Last Day to File and Serve Objections:    | <b>November 16, 2026</b> |
| Last Day to File a Claim Form:            | <b>November 16, 2026</b> |
| Final Approval Hearing:                   | <b>December 10, 2026</b> |