Circuit Court for Genesee County, Michigan

In re: Mid Michigan Medical Billing Service, Inc. Data Security Incident Litigation
Case No. 2026-0000060540-CZ

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOU WERE NOTIFIED THAT YOUR PRIVATE INFORMATION WAS POTENTIALLY COMPROMISED IN THE MARCH 2025 MID MICHIGAN MEDICAL BILLING SERVICE, INC., DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS

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 Mid Michigan Medical Billing Service, Inc. ("MMMBS" or "Defendant") in a class action lawsuit. This case is about the targeted cyberattack on MMMBS' computer systems that occurred in March 2025 (the "Data Incident"). Certain files that contained Private Information were potentially accessed. These files may have contained personal information such as name; date of birth; Social Security number; state identification number; medical information; and health insurance information.
- The lawsuit is called *In re: Mid Michigan Medical Billing Service, Inc. Data Security Incident Litigation*, Case No. 2026-0000060540-CZ. It is pending in the 7th Circuit Court for Genesee County, Michigan (the "Litigation").
- MMMBS 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.
- 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 a cash payment from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.MidMichiganMedicalDataSettlement.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.	**January 18, 2027**
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.	**January 18, 2027**
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. If you object, you may also file a claim for Settlement benefits.	**January 18, 2027**
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive payment 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.

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 7th Circuit Court for Genesee County, Michigan, 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: Mid Michigan Medical Billing Service, Inc. Data Security Incident Litigation*, Case No. 2026-0000060540-CZ. It is pending in the 7th Circuit Court for Genesee County, Michigan. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Mid Michigan Medical Billing Service, Inc., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during the March 2025 targeted cyberattack on MMMBS' computer systems, certain files that contained Private Information were accessed. These files may have contained personal information such as name; date of birth; Social Security number; state identification number; medical information; and health insurance information.

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 Jessica Richards; Adam Miles; Ronald McWhite; and Michael Vorhies. 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. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. 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 Private Information was accessed and/or acquired by an unauthorized party in the Data Breach, including all who were sent a notice of the Data Breach."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all persons who are directors, officers, and agents of Defendant, or their respective subsidiaries and affiliated companies; (2) governmental entities; and (3) the Judge assigned to the Action, that Judge's immediate family, and Court staff.

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@MidMichiganMedicalDataSettlement.com
- Call toll free, 24/7: (833) 360-6845
- By mail: MMMBS Data Incident Settlement
  c/o Settlement Administrator
  PO Box 25226
  Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

MMMBS has agreed to pay for a number of Class benefits, which are explained below. All Class Members are automatically able to enroll in two years of **Credit Monitoring** from CyEx Medical Shield Complete, and may also select **one** of two **Cash Payment** options.

CREDIT MONITORING. All Class Members are able to enroll in two years of CyEx Medical Shield Complete. Enrollment codes have been sent to all Class Members by postcard. 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, documented out-of-pocket losses due to the Data Incident, you can get back up to **$4,500.00**. The losses must have occurred between March 27, 2025, and January 18, 2027.

This benefit covers 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

You need to send proof, like bank statements or receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

-OR-

Cash Payment B – Alternative Cash Payment. *Instead of* 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@MidMichiganMedicalDataSettlement.com
- Call toll free, 24/7: (833)360-6845
- By mail: MMMBS Data Incident 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 MMMBS 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. The Settlement Agreement is available at www.MidMichiganMedicalDataSettlement.com.

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.MidMichiganMedicalDataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

MMMBS Data Incident 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, (833) 360-6845, by email info@MidMichiganMedicalDataSettlement.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 January 18, 2027. 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 **January 18, 2027**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **March 9, 2027 (*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 Emily Hughes of The Miller Law Firm, P.C.; Tonyia Johnson of Shamis & Gentile, P.A.; Jeff Ostrow of Kopelowitz Ostrow P.A.; and Casondra Turner of Milberg PLLC, to represent you and other Class Members ("Class Counsel").

13. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the court to approve $250,000.00 as reasonable attorneys' fees and reimbursement of litigation costs. This amount will be paid by MMMBS.

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 MMMBS.

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 MMMBS 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 **January 18, 2027.**

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

(1) the name of the Litigation: *In re: Mid Michigan Medical Billing Service, Inc. Data Security Incident Litigation*, Case No. 2026-0000060540-CZ, pending in the 7th Circuit Court for Genesee County, Michigan;

(2) your full name, 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:

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

Your Request for Exclusion must be submitted, postmarked, or emailed by **January 18, 2027.**

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 to consider your objection:

(1) the objector's full name, mailing address, telephone number, and email address (if any);

(2) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;

(3) the number of times the objector has objected to a class action settlement within the 5 years preceding the date that the objector files the objection, the caption of each case in which the objector

has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;

(4) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;

(5) the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the 5 years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding 5 years;

(6) the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;

(7) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);

(8) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and

(9) the objector's signature (an attorney's 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 **January 18, 2027**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of the Court	Settlement Administrator
Clerk of the Court 900 S Saginaw St #100, Flint, MI 48502	MMMBS Data Incident Settlement ATTN: Objections PO Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendant
Emily Hughes **The Miller Law Firm, P.C.** 950 West University Drive, Suite 300 Rochester, Michigan 48307 Tonyia Johnson **Shamis & Gentile, P.A.** 14 Northeast 1st Avenue, Suite 705 Miami, Florida 33132 Jeff Ostrow **Kopelowitz Ostrow P.A.**	Colin D. Gerish **Samuel P. Mauch** Saretsky Hart Michaels + Gould PC 995 South Eton Street Birmingham, Michigan 48009 Carolyn Purwin Ryan **Mullen Coughlin LLC** 426 West Lancaster Avenue, Suite 200 Devon, Pennsylvania 19333

One West Las Olas Boulevard, Suite 500 Fort Lauderdale, Florida 33301 Casondra Turner **Milberg PLLC** 260 Peachtree Street Northwest, Suite 2200 Atlanta, Georgia 30303	

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 hearing on **March 9, 2027, at 1:30pm Eastern Time Via Zoom (Zoom ID: 834 487 7653)**.

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, and the Court may decide to hold it via Zoom. Please check www.MidMichiganMedicalDataSettlement.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. 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 cash payment 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 in the Settlement Website's documents section, www.MidMichiganMedicalDataSettlement.com.

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

- Email: info@MidMichiganMedicalDataSettlement.com
- Call toll free, 24/7: (833) 360-6845
- By mail: MMMBS Data Incident 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, 900 S Saginaw St #100, Flint, MI 48502

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