Circuit Court for Montgomery County, Maryland

Rush et al. v. Red Coats, Inc.
Civil Action No. C-15-cv-26-001098

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE MAY 2025 RED COATS, INC. DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND 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 Red Coats, Inc. ("Red Coats" or "Defendant") in a class action lawsuit. This case is about a targeted cyberattack on Red Coats' computer systems that occurred in May 2025 ("Data Incident"). Certain files that contained Private Information were accessed. These files may have contained personal information such as names, addresses, Social Security numbers, and driver's license numbers.
- The lawsuit is called *Rush et al. v. Red Coats, Inc.*, Civil Action No. C-15-cv-26-001098. It is pending in the Circuit Court for Montgomery County, Maryland ("Litigation").
- Red Coats denies that it did anything wrong, and the Court has not decided who is right.
- The Parties have agreed to settle the lawsuit ("Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- Red Coats' records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Red Coats.
- 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.RedCoatsSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.	**January 7, 2027**
OPT OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment or Credit Monitoring. 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.	**December 8, 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. If you object, you may also file a claim for Settlement benefits.	**December 8, 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. 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 and released 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.

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Basic Information

1. Why was this Notice issued?

The Circuit Court for Montgomery County, Maryland, 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 *Rush et al. v. Red Coats, Inc.*, Civil Action No. C-15-cv-26-001098. It is pending in the Circuit Court for Montgomery County, Maryland. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Red Coats, Inc., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during a May 2025 targeted cyberattack on Red Coats' computer systems, certain files that contained Private Information were accessed. These files may have contained personal information such as names; addresses; Social Security numbers; and driver's license numbers.

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 proposed Settlement, the Plaintiffs are Chloris Smith and Jermaine Jackson, Jr. 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 to include: "all persons who were sent written notification of the Data Incident."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (i) the Judge assigned to evaluate the fairness of this settlement; and (ii) 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.

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@RedCoatsSettlement.com
- Call toll free, 24/7: 1-833-360-6781
- By mail: Red Coats Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

All Class Members may claim **credit monitoring and identity theft protection services** and one or more of the **cash payment** options. The benefits are explained in more detail below.

CREDIT MONITORING AND IDENTITY THEFT PROTECTION SERVICES. All Class Members are eligible to enroll in one year of CyEx Financial Shield Complete. This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

If needed, you may contact a fraud resolution agent for assistance.

CASH PAYMENTS. Class Members who have documented losses may claim payment from **reimbursement for Ordinary Out-of-Pocket Losses** and **reimbursement for Extraordinary Out-of-Pocket Losses**. Additionally, Class Members who spent time responding to the Data Incident may claim payment for **reimbursement for Attested Time**. You may claim one or more payments from these options.

> **Reimbursement for Ordinary Out-of-Pocket Losses.** If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **$2,000.00**. The losses must have occurred between May 26, 2025, and January 7, 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 must send proof, like receipts, to show how much you spent or lost. Your personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but you may include that to provide clarification, context, or support for other submitted reasonable documentation showing 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.

Reimbursement for Extraordinary Out-of-Pocket Losses. If you lost money because of identity theft or fraud, you can get back up to **$3,000.00**.

You will need to show that:

- the theft or fraud was more likely than not caused by the Data Incident
- the losses are not already covered by **reimbursement for Ordinary Out-of-Pocket Losses**
- you tried to prevent the loss or get your money back, such as by using insurance you already have

The losses must have occurred between May 26, 2025, and January 7, 2027.

You must send proof, like 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.

Reimbursement for Attested Time. Class Members who spent time responding to the Data Incident may claim up to four hours, at $25.00 per hour, for a maximum of **$100.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- changing your passwords
- investigating suspicious activity in your accounts
- researching the Data Incident

You must briefly describe how you spent this time.

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

- Email: info@RedCoatsSettlement.com
- Call toll free, 24/7: 1-833-360-6781
- By mail: Red Coats Data Incident Settlement
  c/o Settlement Administrator
  P.O. 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 Red Coats related to the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Paragraphs 56–59) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.RedCoatsSettlement.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.RedCoatsSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Red Coats Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-360-6781, by email info@RedCoatsSettlement.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 7, 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 7, 2027.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on January 4, 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.

Please be patient.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed law firms Milberg PLLC; Kopelowitz Ostrow P.A.; and Cole & Van Note, 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 up to $200,000.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by Red Coats.

Class Counsel will also ask for Service Award payments of $1,500.00 for each of the Settlement Class Representatives. Service Award payments will also be paid by Red Coats.

Opting Out 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 an Opt-Out Request.

If you opt out, 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 opt out. However, you will keep any rights you may have to sue Red Coats on your own about the legal issues in this case.

The deadline to opt out from the Settlement is **December 8, 2026**.

To be valid, your Opt-Out Request must have the following information:

(1) the name of the Litigation: *Rush et al. v. Red Coats, Inc.*, Civil Action No. C-15-cv-26-001098, pending in the Circuit Court for Montgomery County, Maryland;

(2) your full name, mailing address, telephone number, and email address;

(3) personal signature; and

(4) the words "Opt-Out Request" 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 Opt-Out Request to the Settlement Administrator at:

Red Coats Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Opt-Out Request must be submitted and postmarked by **December 8, 2026**.

Commenting on or Objecting to the Settlement

16. How do I tell the Court if I 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 opted out from the Settlement (***see* Question 15**).

You must provide the following information for the Court to consider your objection:

(1) the name of the Litigation: *Rush et al. v. Red Coats, Inc.*, Civil Action No. C-15-cv-26-001098, pending in the Circuit Court for Montgomery County, Maryland;

(2) your full name, mailing address, telephone number, and email address (if any);

(3) a statement of the specific grounds for the objection, as well as any documents supporting the objection;

(4) the identity of any attorneys representing the objector; and

(5) the signature of the Class Member or the Class Member's attorney.

For your objection to be considered, 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 **December 8, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator, Class Counsel, and Defendant's Counsel.

Clerk of the Court	Settlement Administrator
Clerk of the Court 50 Maryland Avenue Rockville, MD 20850	Red Coats Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendant
Gary M. Klinger **Milberg PLLC** 277 Monroe Street, Suite 2100 Chicago, IL 60606	Jenn O. Hatcher **Shook, Hardy & Bacon LLP** 2555 Grand Boulevard Kansas City, MO 64108

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 opt-out from the Settlement. Opting out from the Settlement is 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 **January 4, 2027, at 10:00 A.M. Eastern Time**, at the Circuit Court for Montgomery County, Maryland, at 50 Maryland Avenue, Rockville, MD 20850.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award to the Class Representatives. The Court will also consider any timely objections to the Settlement.

If you are a Settlement 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.RedCoatsSettlement.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 pursuant to the requirements 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.RedCoatsSettlement.com.

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

- Email: info@RedCoatsSettlement.com
- Call toll free, 24/7: 1-833-360-6781
- By mail: Red Coats Data Incident Settlement
  c/o Settlement Administrator
  P.O. 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, 50 Maryland Avenue, Rockville, MD 20850.

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