

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Kenneth Keller v. System Pavers, LLC
Case No. 30-2025-01477814-CU-BT-CXC
Superior Court of Orange County, California

IF YOUR PRIVATE INFORMATION WAS POTENTIALLY COMPROMISED IN THE SEPTEMBER 2024 SYSTEM PAVERS, LLC, DATA SECURITY INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS, INCLUDING 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 System Pavers, LLC (“System Pavers” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on System Pavers' computer systems that occurred in September 2024 (the “Data Security Incident”). Certain files that contained private information may have been accessed. These files may have contained personal information such as names and Social Security number.
- This class action lawsuit is called *Kenneth Keller v. System Pavers, LLC*, Case No. 30-2025-01477814-CU-BT-CXC. It is pending in the Superior Court of Orange County, California (the “Litigation”).
- System Pavers denies any wrongdoing, and the Court has not decided who would prevail on the merits .
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- System Pavers' records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from System Pavers.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***
- Para leer este aviso en español, visite www.SystemPaversDataIncident.com/espanol o llame al 1-833-421-7276

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.SystemPaversDataIncident.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.	September 28, 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 Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	August 28, 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 either (a) writing to the Settlement Administrator about why you do not think the Settlement should be approved or (b) appearing at the Final Approval Hearing to voice your concerns. If you object, you may also file a claim for Settlement benefits.	August 28, 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. No Settlement Benefits will be provided unless the Court approves the settlement and it becomes final.

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 Superior Court of Orange County, California, 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 *Kenneth Keller v. System Pavers, LLC*, Case No. 30-2025-01477814-CU-BT-CXC. It is pending in the Superior Court of Orange County, California. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, System Pavers, LLC, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the September 2024 cyberattack on System Pavers' computer systems, certain files that contained private information were or potentially were accessed. These files may have contained personal information such as first name or first initial and last name, and Social Security number.

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 Representative is Kenneth Keller. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or the Defendant. 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 Plaintiff and their attorneys think the Settlement is best for all Class Members.

Questions? Call 1-833-421-7276 Toll-Free or Visit www.SystemPaversDataIncident.com

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: “All individuals residing in the United States whose Personal Information was potentially compromised in the Data Security Incident experienced by System Pavers, including all those who were notified of the Data Security Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) System Pavers and its officers, directors, and related companies; (2) anyone who validly excludes themselves from the Settlement; (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@SystemPaversDataIncident.com
- Call toll free, 24/7: 1-833-421-7276
- By mail: System Pavers Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

System Pavers will establish a Settlement Fund of \$350,544.00. The Settlement Fund will first be used to pay court-approved attorneys’ fees and costs, Service Award payments for the Plaintiffs, and the costs of administering the Settlement. The net remaining money will be used to pay for the benefits described below.

CREDIT MONITORING SERVICES. All Class Members are eligible to enroll in three (3) years 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
- high-risk financial transactions

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH PAYMENTS. In addition to Credit Monitoring, all Class Members may claim one or more of the following cash payment options:

Documented Losses. If you incurred actual, documented, unreimbursed out-of-pocket losses due to the Data Security Incident you can get back up to **\$3,000.00**. The losses must have occurred between September 20, 2024, and September 28, 2026.

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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.

Lost Time. Class Members who spent time responding to the Data Security Incident may claim up to four (4) hours, at \$20.00 per hour, for a maximum of **\$80.00**.

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

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

You must briefly describe how you spent this time. This payment counts toward the \$3,000.00 cap for loss claims.

Alternative Cash Payment. *Instead of any other cash payment option*, you may claim a one-time cash payment. This payment is expected to be **\$100.00** for California residents, and **\$80.00** for residents of all other states. The payment may be larger or smaller depending on the total claims filed. 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@SystemPaversDataIncident.com
- Call toll free, 24/7: 1-833-421-7276
- By mail: System Pavers Data Security Incident Settlement
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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 System Pavers about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section IX) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.SystemPaversDataIncident.com.

Questions? Call 1-833-421-7276 Toll-Free or Visit www.SystemPaversDataIncident.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.SystemPaversDataIncident.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

System Pavers Data Security 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, 1-833-421-7276, by email info@SystemPaversDataIncident.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 September 28, 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 September 28, 2026.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on November 13, 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 Carly M. Roman and Brittany Resch of Strauss Borrelli 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 \$116,848.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for a Service Award Payment of \$3,000.00 for the Class Representative. The Service Award Payment will also be paid from the Settlement Fund.

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 System Pavers 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 **August 28, 2026**.

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

- (1) the name of the Litigation: *Kenneth Keller v. System Pavers, LLC*, Case No. 30-2025-01477814-CU-BT-CXC, pending in the Superior Court of Orange County, California;
- (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:

System Pavers Data Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **August 28, 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 in writing to the Settlement Administrator by the Objection Deadline or appear and orally present at the Final Approval Hearing for the Court to consider your objection:

Questions? Call 1-833-421-7276 Toll-Free or Visit www.SystemPaversDataIncident.com

- (1) the name of the Litigation: *Kenneth Keller v. System Pavers, LLC*, Case No. 30-2025-01477814-CU-BT-CXC, pending in the Superior Court of Orange County, California;
- (2) your full name, mailing address, telephone number, and email address;
- (3) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (4) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (5) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (6) information that proves that you are a Class Member (such as a notice you have received);
- (7) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must either submit your objection in writing to the Settlement Administrator by **August 28, 2026**, or personally appear at the Final Approval Hearing.

Settlement Administrator
System Pavers Data Security Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

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 13, 2026 at 9:00AM Pacific Time**, in Department CX101 of the Superior Court of Orange County, California, at 751 W Santa Ana Blvd, Santa Ana, CA 92701.

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 a Service Award Payment to the Class Representative. 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.SystemPaversDataIncident.com for updates.

Questions? Call 1-833-421-7276 Toll-Free or Visit www.SystemPaversDataIncident.com

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 submit 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 submitted by the Objection Deadline. If you did not timely submit an objection, you may still appear at the Final Approval Hearing at your own expense to orally present your objection. 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.SystemPaversDataIncident.com

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

- Email: info@SystemPaversDataIncident.com
- Call toll free, 24/7: 1-833-421-7276
- By mail: System Pavers Data Security 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, 751 W Santa Ana Blvd, Santa Ana, CA 92701.

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

Questions? Call 1-833-421-7276 Toll-Free or Visit www.SystemPaversDataIncident.com