

Claims Administrator
Domitrovich v M.C. Dean
P.O. Box 2498
Portland, OR 97208-2498

Legal Notice

**If you were sent notice by
M.C. Dean on or about
September 14, 2022, related to
a security incident that may
have impacted you, a
class action settlement may
affect your rights.**

A proposed Settlement has been reached in a class action lawsuit titled, *Domitrovich and Gussie v. M.C. Dean, Inc.* No. 1:23-cv-00210 (E.D. Va.) (the “Lawsuit”). The lawsuit asserts claims against Defendant M.C. Dean (“Defendant”) related to a security incident about which the Defendant notified potentially impacted individuals in September 2022 (the “Incident”). Defendant denies all of the claims and denies that it did anything wrong.

Who is Included? Records indicate that you may be a member of the Settlement Class. The Settlement Class is defined by the Court as all individuals whose Personal Identifying Information (“PII”) was impacted by the Incident that was discovered on June 2, 2022.

What does the Settlement Provide? The proposed Settlement would create a Settlement Fund of \$750,000 that would be used to pay all costs of the Settlement, including: (i) payments to Settlement Class Members who submit valid claims, (ii) costs of administration and notice, (iii) any attorneys’ fees and costs awarded by the Court to Class Counsel (up to \$250,000 plus litigation costs and expenses of up to \$15,000), and (iv) any service awards to the Representative Plaintiffs awarded by the Court (up to \$10,000 total). The Settlement also releases all claims or potential claims of Settlement Class Members against Defendant arising from or related to the Incident, as detailed in the Class Settlement Agreement and Release.

How To Get Benefits: Settlement Class Members who submit valid claims and any required documentation may receive one or more of the following, to be paid from the Settlement Fund: (1) an Alternative Cash Payment of approximately \$225, or (2) an out-of-pocket Reimbursement Award. Depending on how many valid claims are submitted, the amounts of the Alternative Cash Payment will be adjusted upward or downward proportionally among Settlement Class Members submitting valid claims for those awards. Claim Forms must be postmarked or submitted online at www.MCDeanSettlement.com by **May 31, 2024**.

Your Other Options. If you do not want to be legally bound by the Settlement, you must exclude yourself by **May 31, 2024**. If you do not exclude yourself, you will give up any right to sue Defendant for the claims that this Settlement resolves as more fully described in the Settlement Agreement, available at the Settlement website. If you do not exclude yourself, you may object to the Settlement by **May 31, 2024**.

The Court has scheduled a Final Fairness Hearing in this case at 10:00 a.m. Friday, **August 23, 2024**, at the United States District Court for the Eastern District of Virginia, Albert V. Bryan U.S. Courthouse, 401 Courthouse Square, Alexandria, VA 22314, Courtroom 800, to decide whether to approve the Settlement. The Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely objections, the Court will consider them and will listen to people who have properly requested to speak at the hearing. You or your own lawyer may attend and ask to appear at the hearing, but you are not required to do so. The hearing could reschedule to a different date or time, so please check the Settlement website for those details.

More Information. Complete information about your rights and options, as well as important documents (including the Settlement Agreement) are available at www.MCDeanSettlement.com. You may also call toll-free 1-888-890-2748.