

COMMONWEALTH OF MASSACHUSETTS

Essex, ss

SUPERIOR COURT DEPARTMENT

ELAINE LAFRATTA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00106
(Lead Case)

Consolidated With:

CHRISTIAN DONNER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00108

-and-

EVAN WEISENFELD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00110

DECLARATION OF GEARY R. GODFREY REGARDING
IMPLEMENTATION OF NOTICE AND CLAIMS ADMINISTRATION

I, Geary R. Godfrey, hereby declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I have more than eight years of experience working in the legal field. The statements of fact in this Declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.

2. Epiq was appointed as to be the Settlement Administrator pursuant to the Court’s Preliminary Approval Order (the “Order”) dated July 21, 2023 and in accordance with the Class Action Stipulation of Settlement Agreement filed with the court dated October 5, 2023 (the “Settlement Agreement”).¹ I submit this Declaration in order to certify to the Parties and the Court that the Court-approved Class Notice program has been implemented, and that the claims process has launched, in accordance with the Order and the Agreement, and to report on Epiq’s handling to date of the Settlement administration.

3. Epiq was established in 1968 as a client services and data processing company. Epiq has administered bankruptcies since 1985 and settlements since 1993. Epiq has routinely developed and executed notice programs and administrations in a wide variety of mass action contexts including settlements of consumer, antitrust, products liability, and labor and employment class actions, settlements of mass tort litigation, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 4,500 settlements,

¹ All capitalized terms not otherwise defined in this document shall have the same meanings ascribed to them in the [Agreement]

including some of the largest and most complex cases ever settled. Epiq's class action case administration services include administering notice requirements, designing direct-mail notices, implementing notice fulfillment services, coordinating with the United States Postal Service ("USPS"), developing and maintaining notice websites and dedicated telephone numbers with recorded information and/or live operators, processing exclusion requests, objections, claim forms and correspondence, maintaining class member databases, adjudicating claims, managing settlement funds, and calculating claim payments and distributions. As an experienced neutral third-party administrator working with settling parties, courts, and mass action participants, Epiq has handled hundreds of millions of notices, disseminated hundreds of millions of emails, handled millions of phone calls, processed tens of millions of claims, and distributed hundreds of billions in payments.

OVERVIEW OF ADMINISTRATION

4. Pursuant to the Settlement Agreement and Order Epiq was appointed to provide, and has to date executed the following administrative services for the benefit of Class Members, as they are defined in the Settlement Agreement:

- Mail a Postcard Notice to all Class Members;
- Establish and maintain an official Settlement website containing information about the settlement with the address www.mhsclasssettlement.com/;
- Establish and maintain an official toll-free number, 1-888-823-2789, that Class Members may contact to hear additional information about the settlement or request Claim Form;
- Handle mail returned as not delivered and making additional mailings required under the terms of the Settlement Agreement;

- Respond, as necessary, to inquiries from potential Class Members;
- Review and track objections received by Epiq and report them to the Parties;
- Receive, process, track, and report on Claim Forms sent to or received by Epiq;
- As appropriate, mail deficiency and rejection letters, and track responses thereto;

DATA TRANSFER

5. On October 12, 2023, the Defendant provided Epiq with an electronic file containing potential Class Member records. The file contained the names, addresses, and other relevant custom data for potential Class Members Data.

6. Epiq loaded the information provided by the Defendant into a database created for the purpose of administration of the proposed Settlement. Epiq combined the data and removed duplicate records, which resulted in 134,008 Class Member records (the “Class List”) then assigned unique identifiers to all the records it received in order to maintain the ability to track them throughout the Settlement administration process. Of these 134,008 records, 5,927 were missing the necessary elements to comprise a valid mailing address and were not included in the initial mailing population of 128,081 but were maintained in the Class List database.

DISSEMINATION OF THE INDIVIDUAL CLASS NOTICE BY POSTAL MAIL

7. Pursuant to Section 13 of the Agreement and Section 16 of the Order, Epiq sent a Postcard to all potential Class Members via U.S. First Class Mail. On November 6, 2023, Epiq mailed 128,081 Postcard Notices via First Class, US Mail to potential Class Members on the Class List with a valid mailing address. Attached hereto as **Attachment A** is the Postcard.

8. Prior to mailing the Postcard Notice to the Class List, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”).²

² The NCOA database contains records of all permanent change of address submissions received by the USPS for the last four
DECLARATION OF GEARY R GODFREY REGARDING NOTICE AND SETTLEMENT ADMINISTRATION

9. Settlement Administrator fulfilled 37 requests for the Long Form Notice (included as **Attachment B**) along with the Claim Form (included as **Attachment C**).

10. Prior to commencing any mailings for this matter, Epiq established a dedicated post office box for outgoing mail, as a return and mail to address, and incoming Claim Forms, Notices, correspondence, and opt outs, and other mail that may be received from potential Class Members in this matter. Epiq has and will continue to maintain the P.O. Box throughout the administration process.

11. As of January 23, 2024, Epiq has received 15,247 returned Postcard Notices and remained 5,389 to forwarding address provided by USPS. A total of 133,565 Postcard Notices have been mailed. Notices to 9,858 unique recipients are currently known to be undeliverable, which is a deliverable rate of 92.3% to the Class Members included in the initial mailing.

SETTLEMENT WEBSITE

12. Pursuant to Section 50 of the Settlement Agreement and Section 19 of the Order, November 6, 2023 Epiq launched a website, www.mhsclasssettlement.com, that potential Class Members can visit to obtain additional information about the proposed Settlement, as well as important documents about the matter such as the Postcard Notice, Long Form Notice, Claim Form, the Settlement Agreement, and the Preliminary Approval Order. The website also included Frequently Asked Questions (FAQ), important dates and instructions on filing a claim, objecting to the settlement, or opting out of the settlement. The website allows for filing a claim digitally, with the ability to upload supporting documents. There is also an option to print and mail a Claim Form, if preferred. References to the website were prominently displayed in the initial Postcard Notice mailed on November 6, 2023.

years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the person's name and last known address.

DECLARATION OF GEARY R GODFREY REGARDING NOTICE AND SETTLEMENT ADMINISTRATION

13. As of January 23, 2024, the website has been visited by 5,836 unique visitors and 26,405 website pages have been viewed. Epiq has maintained and will continue to maintain the website and will update the website throughout the administration of the proposed Settlement.

TOLL-FREE INFORMATION LINE

14. As directed by the Parties, on November 6, 2023, Epiq established, and continues to maintain, a toll-free interactive Voice Response Unit (“VRU”), 1-888-823-2789, to provide information and accommodate inquiries from potential Class Members. Callers have the option of requesting a Claim Form by mail. The toll-free number was included in the Postcard Notice sent to potential Class Members and is listed in several locations on the settlement website. The automated telephone system is available 24 hours per day, 7 days per week.

15. As of January 23, 2024, the toll-free number has received 420 calls representing 1,263 total minutes. Epiq will continue to maintain and update the VRU throughout the Settlement administration process.

OBJECTIONS RECEIVED

16. Pursuant to Section 22 of the Order, Class Members who wished to object to the Settlement were required to mail written objections to the Court on or before January 5, 2024. Epiq can confirm we are receiving, logging, and tracking all electronic and paper correspondence received to date. As of January 23, 2024, Epiq has not yet received any objections to the Settlement.

CLAIMS RECEIVED

17. As of January 23, 2024, Epiq has received 110 paper claim forms and 3,977 web claim forms for a total of 4,087 claims. Pursuant to section 21 of the Order, Class Members will

have 90 days after Notice Date to complete and submit a claim to the Settlement Administrator.

The Notice Date was November 6, 2023, and the Deadline to file a claim is February 5, 2024.

I declare under penalty of perjury under the laws of the United States and the State of Georgia that the foregoing is true and correct and that this declaration was executed on January 24, 2024, in Lithonia, Georgia

A handwritten signature in black ink, appearing to read "Geary R. Godfrey", written over a horizontal line.

Geary R. Godfrey
Project Manager
Epiq Class Action & Claims Solutions, Inc. (“Epiq”)

Attachment A

Date Filed 1/25/2024 5:02 PM

Superior Court - Essex

Docket Number 217100010
MIS and MCO Data Breach

Settlement Administrator

P.O. Box 2079

Portland, OR 97208-2079

**BARCODE NO
PRINT ZONE**

FIRST-CLASS MAIL
U.S. POSTAGE
PAID
Portland, OR
PERMIT NO. 2882

Notice Regarding Class
Action Settlement
*LaFratta v. Medical
Healthcare Solutions, Inc.*

**Deadline to File Your Claim:
February 5, 2024**

<<MAIL ID>>
<<NAME 1>>
<<NAME 2>>
<<ADDRESS LINE 1>>
<<ADDRESS LINE 2>>
<<ADDRESS LINE 3>>
<<ADDRESS LINE 4>>
<<ADDRESS LINE 5>>
<<CITY, STATE ZIP>>
<<COUNTRY>>

Barcode No-Print Zone

IF YOUR PERSONAL INFORMATION WAS ACCESSED IN A 2021 DATA BREACH AFFECTING MEDICAL HEALTHCARE SOLUTIONS, INC.'S NETWORK SYSTEM, YOU MAY BE ELIGIBLE FOR PAYMENT AND CREDIT MONITORING SERVICES FROM A CLASS ACTION SETTLEMENT.

A settlement has been reached in a class action lawsuit against Medical Healthcare Solutions, Inc. (“MHS”) relating to a cyberattack against MHS’s computer systems that occurred between October 1, 2021 and October 4, 2021 (the “Data Breach”). The computer systems possibly affected by the Data Breach potentially contained personal and protected health information of certain individuals. The Plaintiffs claim that MHS was responsible for the Data Breach and assert claims such as negligence, breach of express contract, breach of implied contract, and unjust enrichment. MHS denies all of the claims.

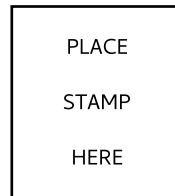
WHO IS INCLUDED? MHS’s records show that your personally identifiable and private health information were accessed in the Data Breach; therefore, you are included in this Settlement as a “Settlement Class Member.”

SETTLEMENT BENEFITS. The Settlement provides for either a cash payment of approximately \$50 subject to proration, or, alternatively, the following benefits: (i) up to \$150 for ordinary unreimbursed out-of-pocket losses incurred as a result of the Data Breach, (ii) up to 3 hours of lost time for Class Members who spent at least one-half hour responding to the Data Breach, at the rate of \$25 per hour, (iii) up to \$5,000 for extraordinary unreimbursed out-of-pocket losses incurred as a result of the Data Breach, and (iv) two years of three-bureau credit monitoring services.

WHAT ARE MY OPTIONS? To receive payment, you must submit a Claim Form by **February 5, 2024**. The Claim Form can be found on the website www.MHSClassSettlement.com. If you want to object to the Settlement, you must file an objection by **January 5, 2024**. The Long Form Notice available on the Settlement Website explains how to submit a Claim Form or object.

THE COURT’S FAIRNESS HEARING. The Court will hold a Fairness Hearing on **February 8, 2024**, to consider whether to approve the Settlement, a request for attorneys’ fees, costs, and expenses for Plaintiff’s counsel, and a service award for the Settlement Class Representative.

Date Filed 1/25/2024 5:02 PM
Superior Court - Essex
Docket Number 2277CV00106



LAFRATTA V MHS
C/O SETTLEMENT ADMINISTRATOR
PO BOX 2079
PORTLAND OR 97208-2079



Attachment B

COMMONWEALTH OF MASSACHUSETTS

If your personal information was accessed in a 2021 Data Breach affecting Medical Healthcare Solutions, Inc.’s network system, you may be eligible for a payment and/or credit monitoring services from a class action settlement.

A state court authorized this Notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.

- A settlement has been reached with Medical Healthcare Solutions, Inc. (“MHS”) and McCormack Consultants, Inc. (“MCI”) relating to a cyberattack against MHS’s computer systems that occurred between October 1, 2021 and October 4, 2021 (the “Data Breach”). The computer systems affected by the Data Breach contained personal identifying information and protected health information of certain individuals. The Plaintiff claims that MHS and MCI were responsible for the Data Breach and asserts claims such as negligence, breach of express and implied contract, and unjust enrichment against MHS. MHS and MCI deny all of the claims.
- If you received a notification from MHS of the Data Breach, you are included in this Settlement as a “Settlement Class Member.”
- The Settlement provides payments to people who submit valid claims for expenses and lost time relating to the Data Breach, and for credit monitoring and identity protection services. Alternately, you may forego those benefits for a cash payment estimated to be \$50.00. It also provides for equitable relief in the form of data security enhancements.
- Your legal rights are affected regardless of whether you do or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM BY FEBRUARY 5, 2024	This is the only way you can get payment or a code for credit monitoring services.
OBJECT TO THE SETTLEMENT BY JANUARY 5, 2024	Write to the Court with reasons why you do not agree with the Settlement.
GO TO THE FINAL FAIRNESS HEARING ON FEBRUARY 8, 2024	You may ask the Court for permission for you or your attorney to <i>speak</i> about your objection at the Final Fairness Hearing.
DO NOTHING	You will not get any compensation or credit monitoring from this Settlement and you will give up certain legal rights. Submitting a claim form is the only way to obtain payment or credit monitoring from this Settlement.

- These rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Settlement Agreement, available at www.MHSClassSettlement.com, or call 1-888-823-2789.
- The Court in charge of this case still has to decide whether to grant final approval of the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals of the Court’s order granting final approval are resolved.

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BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, and after objections or appeals, if any, are resolved, the Settlement Administrator appointed by the Court will distribute the payments that the Settlement allows. This Notice explains the lawsuit, the Settlement, your legal rights, what payments are available, who is eligible for them, and how to get them.

The Court in charge of this case is the Essex County Superior Court, Massachusetts. The case is known as *LaFratta v. Medical Healthcare Solutions, Inc.*, No. 2277CV00106 (Essex Sup. Ct.) (the “Lawsuit”). The person who filed the Lawsuit is called the Plaintiff and the entity she sued, Medical Healthcare Solutions, Inc., is called the Defendant.

2. What is this Lawsuit about?

The Lawsuit claims that MHS was responsible for the Data Breach and asserts claims such as: negligence, breach of express and implied contract, and unjust enrichment. The Lawsuit seeks, among other things, payment for persons who were injured by the Data Breach.

MHS has denied and continues to deny all of the claims made in the Lawsuit, as well as all charges of wrongdoing or liability against it.

3. What is a class action?

In a class action, one or more people called Class Representatives sue on behalf of people who have similar claims. Together, all these people are called a Class or Class members. One Court and one judge resolves the issues for all Class members.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiff or Defendant. Instead, the Plaintiff negotiated a settlement with MHS and MCI that allows both the Plaintiff and MHS and MCI to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Settlement Class Members to obtain payment and credit monitoring services without further delay. The Class Representative and her attorneys think the Settlement is best for all Settlement Class Members. This Settlement does not mean that MHS or MCI did anything wrong.

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are part of this Settlement as a Settlement Class Member if your personal information was accessed in the Data Breach or you previously received a notification from MHS pertaining to the Data Breach.

6. Are there exceptions to being included in the Settlement?

Yes. Specifically excluded from the Settlement Class are: MHS and MCI and their respective affiliates, parents, subsidiaries, officers, agents, and directors, as well as the judge(s) presiding over this matter and the clerks of said judge(s).

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement will provide payments and credit monitoring services to people who submit valid claims. The Settlement also provides for equitable relief in the form of data security enhancements.

Settlement Class Members can claim (i) up to \$150 for Ordinary Loss Reimbursements (Question 8, below); (ii) Lost Time of up to 3 hours (Question 8, below); and (iii) up to \$5,000 in Extraordinary Loss Reimbursements (Question 8, below). You may submit a claim for any or all of these types of payments. In order to claim each type of payment, you must provide related documentation with the Claim Form. Settlement Class Members can also make a claim for (iv) up to 24 months of credit monitoring and identity protection services (Question 9, below).

Alternatively, Settlement Class Members can forego these benefits in exchange for a one-time Cash Payment of approximately \$50, subject to proration (Question 10, below).

8. What payments are available for Loss Reimbursement?

Settlement Class Members are eligible to receive reimbursement of up to \$150 (in total) for the following categories of documented out-of-pocket expenses resulting from the Data Breach including but not limited to:

- bank fees,
- long distance phone charges,
- cell phone charges (only if charged by the minute),
- data charges (only if charged based on the amount of data used),
- postage, and
- gasoline for local travel.

Settlement Class Members can also receive reimbursement of fees for credit reports, credit monitoring, or other identity theft insurance products, purchased between October 4, 2021, and the date of the close of the claims period.

In addition to these reimbursements, Settlement Class Members may make a claim for up to three (3) hours of lost time spent dealing with the Data Breach, to be paid out at \$25 per hour. At least one-half hour of documented time must have been spent dealing with the Data Breach to obtain compensation for lost time.

Settlement Class Members may also make a claim for up to \$5,000 in Extraordinary Loss Reimbursements. To obtain reimbursement for Extraordinary Losses, Settlement Class Members must prove that he or she suffered a monetary loss directly arising from identity theft or other fraud perpetrated on or against the Settlement Class Member if: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not the result of the Data Breach; (iii) the loss is not already covered by the “Compensation for Ordinary Losses” category; and (iv) the Settlement Class Member made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring insurance and identity theft insurance and other available insurance.

Claims for Ordinary Loss Reimbursements and Extraordinary Loss Reimbursements must be supported by reasonable documentation. Claims for Lost Time must be reasonably described and supported by an attestation under penalty of perjury that the time spent was reasonably incurred dealing with the Data Breach.

9. What credit monitoring and identity theft protections are available?

Settlement Class Members who submit a valid claim are eligible to enroll in a total of 24 months of credit monitoring services through Equifax Complete™ Premier. Equifax Complete™ Premier services include: real time monitoring of the credit file at all three major credit bureaus, identity theft insurance (no deductible) of one million dollars (\$1,000,000), and access to fraud resolution agents to help resolve identity thefts.

More details are provided in the Settlement Agreement, which is available at www.MHSClassSettlement.com.

10. What cash compensation is available?

In lieu of the benefits described in Questions 8 and 9 above, Settlement Class Members may file a claim for a cash payment estimated at \$50. This cash payment is subject to increase or decrease by proration depending on how much money is left in the Settlement Fund after other payments are made.

HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM

11. How do I get benefits from the Settlement?

To ask for a payment, you must complete and submit a Claim Form. Claim Forms are available at www.MHSClassSettlement.com, where you may also submit your Claim Form online. You may also request one by mail by calling 1-888-823-2789. Read the instructions carefully, fill out the Claim Form, and either submit it online or mail it postmarked no later than **February 5, 2024** to:

MHS and MCI Data Breach Settlement Administrator
P.O. Box 2079
Portland, OR 97208-2079

12. How will claims be decided?

The Settlement Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Settlement Administrator may require additional information from any claimant and will specify a time within which any such additional information must be provided. If the required information is not provided within the time specified, the claim will be considered invalid and will not be paid.

Additional information regarding the claims process can be found in Section VI of the Settlement Agreement, available at www.MHSClassSettlement.com.

13. When will I get my payment?

The Court will hold a Final Fairness Hearing at 2:00 p.m. on **February 8, 2024** to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably and resolving them can take time. It also takes time for all the Claim Forms to be processed, depending on the number of claims submitted and whether any appeals are filed. Please be patient.

REMAINING IN THE SETTLEMENT

14. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want a payment or credit monitoring services you must submit a Claim Form postmarked or submitted online by **February 5, 2024**.

15. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue MHS and MCI for the claims being resolved by this Settlement. The specific claims you are giving up against MHS and MCI are described in Section XIV of the Settlement Agreement. You will be “releasing” MHS and MCI and all related people or entities as described in Section XIV of the Settlement Agreement. The Settlement Agreement is available at www.MHSClassSettlement.com.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions about what this means you can talk to the law firms listed in Question 18 for free or you can, of course, talk to your own lawyer at your own expense.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes. The Court appointed Ben Barnow and Anthony Parkhill of Barnow and Associates, P.C., located at 205 W. Randolph St., Ste. 1630, Chicago, Illinois 60606 and David Pastor of Pastor Law Office, located at 63 Atlantic Avenue, 3rd Floor, Boston, Massachusetts 02110, to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees in the amount of \$242,422.00 plus reasonable litigation costs and expenses. Class Counsel will also request approval of a service award of \$2,000 for the Class Representative. If approved, these amounts, as well as the costs of notice and settlement administration, will be taken from the settlement amount prior to payments made to Settlement Class Members.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

18. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must file with the Court and mail copies to Class Counsel and MHS and MCI's Counsel a written notice stating that you object to the Settlement in *LaFratta v. Medical Healthcare Solutions, Inc.*, No. 2277CV00106.

Your objection must:

- (i) state the case name and number: *LaFratta v. Medical Healthcare Solutions, Inc.*, No. 2277CV00106;
- (ii) set forth the Settlement Class Member's full name, current address, and telephone number;
- (iii) contain the Settlement Class Member's original signature;
- (iv) state that the Settlement Class Member objects to the Settlement, in whole or in part;
- (v) set forth a statement of the legal and factual basis for the Objection; and
- (vi) provide copies of any documents that the Settlement Class Member wishes to submit in support of his/her position.

Your objection must be filed with the Clerk of the Essex County Superior Court, 56 Federal Street, Salem, Massachusetts 01970, and served upon Class Counsel and MHS and MCI's Counsel at the addresses below no later than **January 5, 2024**.

CLASS COUNSEL	MHS AND MCI'S COUNSEL
Ben Barnow Barnow and Associates, P.C. 205 W. Randolph St., Suite 1630 Chicago, Illinois 60606	David A. Carney Baker & Hostetler, LLP 127 Public Square, Suite 2000 Cleveland, Ohio 44114 Kenneth B. Walton Lewis Brisbois Bisgaard & Smith, LLP One International Place, Suite 350 Boston, Massachusetts 02110

An objecting Settlement Class Member has the right, but is not required, to attend the Final Approval Hearing. If you intend to appear at the Final Approval Hearing, either with or without counsel, you must also file a notice of appearance with the Court (as well as serve the notice on Class Counsel and MHS and MCI's Counsel) by the Objection Deadline.

If you intend to appear at the Final Approval Hearing through counsel, you must also identify the attorney(s) representing you who will appear at the Final Approval Hearing and include the attorney(s) name, address, phone number, e-mail address, state bar(s) to which counsel is admitted, as well as associated state bar numbers.

If you fail to timely file and serve an Objection and notice, if applicable, of your intent to appear at the Final Approval Hearing in person or through counsel, you will not be permitted to object to the approval of the Settlement at the Final Approval Hearing and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

THE COURT'S FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you do not have to.

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Fairness Hearing at 2:00 p.m. on **February 8, 2024**, in the Essex County Superior Court, Courtroom 2, 43 Appleton Way, Lawrence, Massachusetts 01841. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed written objections and may also listen to people who have asked to speak at the hearing (see Question 18). The Court will also decide whether to approve fees and reasonable litigation costs to Class Counsel, and the service award to the Class Representatives.

20. Do I have to come to the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

21. May I speak at the Final Fairness Hearing?

Yes, you may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must follow the instructions provided in Question 18 above.

IF YOU DO NOTHING

22. What happens if I do nothing?

If you do nothing, you will not receive any compensation from this Settlement. If the Court approves the Settlement, you will be bound by the Settlement Agreement and the Release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against MHS and MCI or related parties about the issues involved in the Lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

23. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at www.MHSClassSettlement.com, or by writing to the MHS and MCI Settlement Administrator, P.O. Box 2079, Portland, OR 97208-2079.

24. How do I get more information?

Go to www.MHSClassSettlement.com, call 1-888-823-2789, or write to the MHS and MCI Settlement Administrator, P.O. Box 2079, Portland, OR 97208-2079.

***Please do not call the Court or the Clerk of the Court for additional information.
They cannot answer any questions regarding the Settlement or the Lawsuit.***

Attachment C

DATE ID
0000PLACEHOLDER000

**Your claim must be
postmarked by:
February 5, 2024.**

COMMONWEALTH OF MASSACHUSETTS

LaFratta v. Medical Healthcare Solutions, Inc.,
Case No. 2277CV00106

**Medical Healthcare
Solutions, Inc.**

Claim Form

This claim form should be filled out online or submitted by mail if your personal information was accessed as a result of a data incident that occurred between October 1, 2021 and October 4, 2021 (the "Data Breach"), and you would like to receive a benefit from the Settlement. You may receive a payment or other benefit if you fill out this claim form, if the Settlement is approved, and if you are found to be eligible for a payment.

The settlement notice describes your legal rights and options. Please visit the official settlement administration website, www.MHSClassSettlement.com, or call 1-888-823-2789 for more information.

If you wish to submit a claim for a settlement payment, you need to provide the information requested below. Please print clearly in blue or black ink. This claim form must be mailed and postmarked by **February 5, 2024**.

I. CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name and contact information below. You must notify the Settlement Administrator if your contact information changes after you submit this form.

First Name	MI	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Street Address

City	State	ZIP Code
<input type="text"/>	<input type="text"/>	<input type="text"/>

Phone Number

 - -

Email Address

Unique ID

II. RELIEF SELECTION

Please select the relief you would like from either Section 2.A **or** Section 2.B below.

Please review the notice and section V of the Settlement Agreement (available at www.MHSClassSettlement.com) for more information on who is eligible for a payment and the nature of the expenses or losses that can be claimed.

If you do not clearly indicate whether you would prefer option 2.A or 2.B below, your claim form may be deemed invalid.

2.A. I choose a cash payment of approximately \$50, subject to proration in accordance with the Settlement.

By marking this box, I willingly forego all compensation under Section 2.B. of this Claim Form and instead opt for a flat cash payment of approximately \$50, subject to proration depending on how many claims are filed.

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2.B. I choose credit monitoring and reimbursement for ordinary expenses, lost time, and extraordinary expenses.

Please provide as much information as you can to help us figure out if you are entitled to a settlement payment.

PLEASE PROVIDE THE INFORMATION LISTED BELOW:

Check the box for each category of benefits you would like to claim. Categories include: reimbursement for ordinary losses (up to a maximum of \$150.00), reimbursement for lost time (up to 3 hours at \$25 per hour), reimbursement of extraordinary losses incurred as a result of the Data Breach (up to a maximum of \$5,000), and 24 months of identity theft monitoring to be paid for by Defendant. Please be sure to fill in the total amount you are claiming for each category and to attach documentation of the charges as described in bold type (if you are asked to provide account statements as part of proof required for any part of your claim, you may mark out any unrelated transactions if you wish).

a. Ordinary Losses Resulting from the Data Breach:

I incurred unreimbursed charges as a result of the Data Breach.

Examples - documented bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, gasoline for local travel, and bank fees. This category also includes fees for credit reports, credit monitoring, or other identity theft insurance product purchased between October 4, 2021 and February 5, 2024.

All ordinary out-of-pocket expenses must be more likely than not attributable to the Data Breach.

Total amount for this category: \$.

Describe your ordinary expense(s) below, including date each expense was incurred and its relation to the Data Breach.

Documentation of out-of-pocket expenses is required.

If you are seeking reimbursement for fees, expenses, or charges, you MUST attach a copy of a statement from the company that charged you, or a receipt for the amount you incurred.

If you are seeking reimbursement for credit reports, credit monitoring, or other identity theft insurance product purchased between October 4, 2021, and February 5, 2024, you MUST attach a copy of a receipt or other proof of purchase for each credit report or product purchased. (Note: By claiming reimbursement in this category, you certify that you purchased the credit monitoring or identity theft insurance product primarily because of the Data Breach and not for any other purpose).

Supporting documentation must be provided. You may mark out any transactions that are not relevant to your claim before sending in the documentation.

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b. Extraordinary Losses Resulting from the Data Breach

I incurred extraordinary losses as a result of the Data Breach.

Total amount for this category: \$ •

Check this box to confirm that you have exhausted all applicable insurance policies, including credit monitoring insurance and identity theft insurance.

Describe your extraordinary expense(s) below, including the date each expense was incurred and its relation to the Data Breach.

Documentation of the extraordinary loss is required. The loss must be more likely than not the result of the Data Breach and must not already be covered by the ordinary reimbursement category.

You may mark out any transactions that are not relevant to your claim before sending in the documentation.

c. Between one-half and three hours of documented time spent dealing with the Data Breach

I certify that I spent time dealing with the effects of the Data Breach.

Examples – You spent at least one half-hour calling customer service lines, writing letters or emails, or on the Internet in order to get fraudulent charges reversed or in updating automatic payment programs because your card number changed. You spent at least one half-hour rescheduling medical appointments and/or finding alternative medical care and treatment, retaking or submitting to medical tests, locating medical records, retracing medical history as a result of the Data Breach.

I certify that I spent the following amount of time in response to the Data Breach:

0.5 Hour 1 Hour 1.5 Hours 2 Hours 2.5 Hours 3 Hours

Provide a brief description of the activities completed during the above-described time:

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d. Claim up to 24 months of credit monitoring and identity protection services.

I would like to claim up to 24 months of credit monitoring and identity protection services.

The Settlement requires Defendant to provide up to 24 months of credit monitoring and identity protection services, which includes: (1) real time monitoring of the credit file at all three major credit bureaus; (2) identity theft insurance (no deductible) of \$1,000,000; and (3) access to fraud resolution agents to help resolve identity thefts.

III. PAYMENT

If you made a claim for payment on this Claim Form, and if your claim and the Settlement are finally approved, an email will be sent from noreply@epiqpay.com to the email address you provided on this Claim Form, prompting you to elect your method of payment. Popular electronic payment options will be available, or you can elect to receive a check. Please ensure you have provided a current and complete email address. If you do not provide a current and valid email address, the Settlement Administrator may attempt to send you a check relying on your physical address on file.

IV. SIGN AND DATE YOUR CLAIM FORM

I declare under penalty of perjury under the laws of the United States and the laws of my State of residence that the information supplied in this claim form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid.

[Signature box]

Your signature

Date: [MM] - [DD] - [YYYY]
MM DD YYYY

[Name box]

Your name

MAIL YOUR CLAIM FORM OR SUBMIT YOUR CLAIM FORM ONLINE.

This claim form must be:

Postmarked by February 5, 2024 and mailed to: MHS and MCI Settlement Administrator, P.O. Box 2079, Portland, OR 97208-2079,

OR Submitted through the Settlement Website by midnight on February 5, 2024 at: www.MHSClassSettlement.com.