

If you received notice from St. Louis University (“SLU”) concerning a Data Incident, you may be eligible for benefits from a class action settlement.

A court has authorized this notice. This is not a solicitation from a lawyer.

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

Para una notificación en Español, visitar www.StLouisUniversityDataIncident.com.

- A settlement has been reached in a class action lawsuit against St. Louis University and SSM-SLUH (“Defendants” or “SLU”) relating to a Data Incident. On or about March 2, 2023, Defendant SLU discovered it was the victim of the unauthorized access of current and former students’, employees’ and other patients’ Personal Information maintained on Defendant SLU’s computer network. The investigation revealed that unauthorized actors had access to the Personal Information for eight months (December 2022 – July 2023). The impacted files may include, but are not limited to, names, addresses, dates of birth, telephone numbers, driver’s license numbers, passport numbers, online credentials, digital signatures, email addresses, and Social Security numbers, and health insurance information, and other medical information. (“Data Incident”).
- The Settlement Class includes all individuals residing within the United States who received notice that their Private Information was potentially exposed to unauthorized third parties as a result of the Data Incident. Settlement Class members may submit a Claim for a Cash Payment for up to \$2,500.00 upon presentment of actual documented losses fairly traceable to the Data Incident. The loss must have occurred after April 24, 2023, and before the close of the Claim Deadline. In addition to the documented losses benefit, Settlement Class Members may also Claim a flat Cash Payment in the estimated amount of \$100.00 (subject to decrease). In addition to, and regardless of whether you submit a Claim for the monetary benefits described above, Settlement Class members may Claim one (1) year of three-bureau credit monitoring and identity theft protection services.
- 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 DEADLINE: JUNE 13, 2025	Submitting a Claim Form is the only way that you can receive Settlement Class Member Benefits provided by this Settlement, including, Documented Losses, a Flat Cash Payment, and/or Credit Monitoring. If you submit a Claim Form, you will give up the right to sue SLU in a separate lawsuit about the legal claims this Settlement resolves.
OPT-OUT OF THE SETTLEMENT DEADLINE: MAY 27, 2025	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Defendants for the claims this settlement resolves. If you opt-out of the Settlement, you will give up the right to receive Settlement Class Member Benefits from this settlement.
OBJECT TO THE SETTLEMENT DEADLINE: MAY 27, 2025	You may object to the settlement by writing to the Court and informing it why you do not think the Settlement should be approved. If you object, you may also file a Claim Form to receive Settlement Class Member Benefits, but you will give up the right to sue Defendants in a separate lawsuit about the legal claims this Settlement resolves.
GO TO THE FINAL APPROVAL HEARING DATE: JUNE 26, 2025 AT 1:30 PM CST	You may attend the Final Approval Hearing where the Court may hear arguments concerning approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must make a request to do so in your written objection or comment. You are not required to attend the Final Approval Hearing.

DO NOTHING

If you do nothing, you will not receive Settlement Class Member Benefits and you will give up your rights to sue Defendants and certain Released Parties for the claims this Settlement resolves.

- 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.StLouisUniversityDataIncident.com, or call [1-844-410-7258](tel:1-844-410-7258).
- The Court in charge of this case still has to decide whether to grant Final Approval of the Settlement. Cash Payments will only be made after the Court grants Final Approval of the Settlement and after any appeals are resolved.

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BASIC INFORMATION

1. Why is this notice being provided?

The Court authorized this notice 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 Cash Payments that the Settlement allows. This notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of this case is the Circuit Court for St. Louis City, Missouri. The case is known as *M.W., et al., v. St. Louis University, et al.* Case No. 2422-CC00888 (“Action”). The individuals who filed the lawsuit are called the Plaintiffs and the entities they sued are called the Defendants. Plaintiffs and Defendants agreed to this Settlement.

2. What is this lawsuit about?

The lawsuit claims that the Defendants were responsible for the Data Incident. Plaintiffs allege that unauthorized actors accessed current and former students’, employees’, and other patients’ Personal Information between December 2022 and July 2023. The impacted files may include, but are not limited to, names, addresses, dates of birth, telephone numbers, driver’s license numbers, passport numbers, online credentials, digital signatures, email addresses, and Social Security numbers, and health insurance information, and other medical information.

Defendants do not in any way acknowledge, admit to, or concede any of the allegations made in the Petition (and similarly do not concede any of the allegations in the other petitions in the related actions), and disclaim and deny any fault or liability, or any charges of wrongdoing that have been or could have been asserted in the Petition.

3. What is a class action?

In a class action, one or more people called Class Representatives (in this case, M.W.,DT.L., T.K, and Elizabeth Teague) sue on behalf of people who have similar claims. Together, all these people are called Settlement Class members. One court and one judge resolves the issues for all class members, except for those who opt-out of the Settlement Class.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendants. Instead, both sides agreed to a settlement. That way, they avoid the cost of a trial, and the people affected will get compensation. The Class Representatives and their attorneys think the Settlement is best for the Settlement Class.

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are in the Settlement Class as a Settlement Class member if you received Notice that your Private Information was potentially exposed to unauthorized third parties as a result of the Data Incident. If you received the mailed Notice of this Settlement, you are a Settlement Class member, and your legal rights are affected by this Settlement. If you have any questions as to whether you are a Settlement Class member, you may contact the Settlement Administrator by calling **1-844-410-7258**, by emailing info@StLouisUniversityDataIncident.com, or by visiting www.StLouisUniversityDataIncident.com.

Questions? Go to www.StLouisUniversityDataIncident.com or call 1-844-410-7258

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

Yes. The Settlement Class specifically excludes: (a) executives or board members of the Defendants; (b) governmental entities; and (c) the Court, the Court's immediate family, and Court staff.

THE SETTLEMENT CLASS MEMBER BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the settlement provide?

The Settlement will provide Class members with the opportunity to select and make a Claim for one of the following Settlement Class Member Benefits:

1. Cash payments of up to \$2,500 per Settlement Class Member for reimbursement of Documented Losses;

AND/OR

2. In addition to the Documented Losses option, Settlement Class Members may claim a flat cash payment in the estimated amount of \$100 (subject to pro rata decrease depending upon the number of Valid Claims filed).

In addition to, and regardless of whether you submit a Claim for, the monetary benefits described above, Settlement Class members may Claim one (1) year of three-bureau credit monitoring and identity theft protection services.

Plaintiffs have received assurances that SLU has undertaken reasonable steps to further secure their systems and environments. Defendants have provided confidential discovery regarding the facts and circumstances of the Data Incident and Defendants' responses thereto, and the changes and improvements that have been made to protect class members' Private Information.

8. What payments are available for Documented Losses?

Settlement Class members may submit a claim for a Cash Payment under this section for up to \$2,500.00 per Settlement Class Member upon presentment of actual documented losses fairly traceable to the Data Incident. The loss must have occurred after April 24, 2023, and before the close of the Claim Deadline.

To receive a documented loss payment, a Settlement Class Member must elect Cash Payment A on the Claim Form attesting under penalty of perjury to incurring documented losses. Settlement Class Members will be required to submit reasonable documentation supporting the losses. Settlement Class Members shall not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including compensation provided in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by Defendants or otherwise.

If a Settlement Class member does not submit reasonable documentation supporting a loss, or if their Claim is rejected by the Settlement Administrator for any reason, and the Settlement Class member fails to cure his or her Claim, the Claim will be rejected and the Settlement Class member's Claim will not receive a Cash Payment.

9. What does Credit Monitoring Provide?

In addition to, and regardless of whether they submit a Claim for, the monetary benefits described in question 7, Settlement Class members may elect up to one year of three-bureau Credit Monitoring that will provide the

following benefits: three-bureau credit monitoring, dark web monitoring, identity theft insurance coverage for up to \$1,000,000, and fully managed identity recovery services.

HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM

10. How do I get Settlement Class Member Benefits from the Settlement?

To qualify for Settlement Class Member Benefits, you must complete and submit a Claim Form. You may submit a Claim Form online at www.StLouisUniversityDataIncident.com and follow the instructions. Online Claim Forms must be submitted by June 13, 2025. You may also download a paper Claim Form on the Settlement Website or call the Settlement Administrator at **1-844-410-7258** to request a paper Claim Form be mailed to you. Claim Forms sent by mail must be **postmarked by June 13, 2025**, to:

SLU Data Incident Settlement Administrator
P.O. Box 3116
Baton Rouge, LA 70821

If you have questions about the Claim submission process you may call the Settlement Administrator at 1-844-410-7258 or visit www.StLouisUniversityDataIncident.com for more information.

11. 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. If the required information is not timely provided, the Claim will be considered invalid and will not be paid.

12. When will I get my Cash Payment?

The Court will hold a Final Approval Hearing at **1:30 pm on June 26, 2025**, 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

13. 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 to receive Settlement Class Member Benefits, you must submit a Claim Form online or postmarked by **June 13, 2025**.

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

If the Settlement becomes final, you will give up your right to sue Defendants for the claims being resolved by this settlement. You will be “releasing” Defendants and all related people or entities (collectively, “Released Parties”) as described in Section 6 of the Settlement Agreement. The Settlement Agreement is available at www.StLouisUniversityDataIncident.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.

OPTING YOURSELF OUT OF THE SETTLEMENT

If you do not want a Cash Payment from this Settlement, but you want to keep the right to sue Defendants about issues in the Action, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or “opting out” of – the Settlement Class.

15. If I opt-out, can I still get Cash Payment from the Settlement?

No. If you opt-out of the Settlement, you will not be entitled to any benefits of the Settlement, but you will not be bound by any judgment in this case.

16. If I do not opt-out, can I sue SLU for the same thing later?

No. Unless you opt-out of the Settlement, you give up any right to sue Defendants for the claims that this Settlement resolves. You must opt-out of the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you opt-out, do not submit a Claim Form to ask for a Cash Payment.

17. How do I get out of the Settlement?

To opt-out of the Settlement, you must send written notice by mail stating that you want to be excluded from the settlement in *M.W., et al., v. St. Louis University, et al.*. The opt-out request must be personally signed by the Settlement Class member and contain the name, address, telephone number, and email address (if any), and include a statement indicating a request to opt-out of the Settlement Class. You must mail your opt-out request postmarked no later than **May 27, 2025**, to:

SLU Data Incident Settlement Administrator
P.O. Box 3116
Baton Rouge, LA 70821

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Maureen Brady of McShane & Brady, LLC, Jeff Ostrow of Kopelowitz Ostrow P.A., and Andrew Shamis of Shamis & Gentile, P.A., 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.

19. Class Counsel’s attorneys’ fees and Service Awards for the Class Representatives?

Class Counsel may apply to the Court for an award of attorneys’ fees in an amount not to exceed \$700,000, plus reimbursement of reasonable costs. Defendants reserve the right to oppose any application. Class Counsel will also apply to the Court to award the Class Representatives up to \$2500 each for serving as the representatives for the Settlement Class. If approved, any attorneys’ fees and cost awards and Service Awards approved by the Court shall be paid by the Defendants directly to Class Counsel by the Effective Date.

The payment of attorneys’ fees, costs, expenses, and Service awards shall be paid outside of the aggregate cap for documented losses, flat cash payments, and Credit Monitoring. Class Counsel’s Application for Attorneys’ Fees, Costs, and Service Awards, will be part of the Motion for Final Approval and will be available on the Settlement Website at www.StLouisUniversityDataIncident.com no later than 45 days before the Final Approval Hearing.

OBJECTING TO THE SETTLEMENT

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

20. 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. This includes Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards. For an objection to be considered by the Court, the objection must be submitted in writing no later than the last day of the Objection Period, as specified in the Notice. If submitted by mail, an objection shall be deemed to have been submitted when posted if received with a postmark date indicated on the envelope if mailed first-class postage prepaid and addressed in accordance with the instructions. If submitted by private courier (e.g., Federal Express), an objection shall be deemed to have been submitted on the shipping date reflected on the shipping label. There shall be no combined, collective, or joint objections and, in the event any combined, collective, or joint objections are submitted, they shall be deemed invalid as to all such persons.

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 to the settlement in *M.W, et al., v. St. Louis University, et al.*, you must file a written notice with the Clerk of the Court by **May 27, 2025**.

Your objection must include:

- (a) the objector's full name, mailing address, telephone number, and email address (if any);
- (b) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- (c) the identity of all counsel who represent the objector, including the identity of all counsel (if any) representing the objector who will appear at the Final Approval Hearing;
- (d) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (e) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- (f) the objector's signature (an attorney's signature is not sufficient).

Class Counsel and/or Defendants' Counsel may conduct limited discovery on any objector or objector's counsel.

You must mail your objection to the Clerk of Court postmarked no later than **May 27, 2025**, to:

Clerk of Court
10 North Tucker Boulevard
St. Louis, Missouri 63101

You must also mail copies of your objection to Class Counsel and Defendant's Counsel postmarked no later than **May 27, 2025**, at all of the addresses below.

CLASS COUNSEL	SLU's COUNSEL
<p data-bbox="347 268 699 422">Maureen Brady McShane & Brady, LLC 4006 Central Kansas City, MO 64111 mbrady@mcshanebradylaw.com</p> <p data-bbox="347 453 711 606">Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 ostrowkolawyers.com</p> <p data-bbox="367 638 675 791">Andrew Shamis Shamis & Gentile, P.A. 14 NE 1st Ave., Ste. 705 Miami, FL 33132 ashamis@shamisgentile.com</p>	<p data-bbox="967 268 1235 422">Mark A. Olthoff Polsinelli PC 900 W. 48th Place Kansas City, MO 64112 molthoff@polsinelli.com</p>

21. What is the difference between objecting to opting out of the Settlement?

Objecting is telling the Court that you do not like something about the settlement. Opting-out is telling the Court that you do not want to be part of the Settlement Class in this settlement. If you opt-out from the Settlement, you have no basis to object or submit a Claim Form because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL 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. You cannot speak at the hearing if you opt-out of the Settlement.

22. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing at **1:30 p.m.** on **June 26, 2025**, in the Circuit Court for St. Louis City, Missouri, 10 North Tucker Boulevard St. Louis, Missouri 63101. 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 20). The Court will also decide whether to approve attorneys' fees and costs to Class Counsel, and a Service Award to the Class Representatives.

23. Do I have to come to the Final Approval 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.

24. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 20 above. You cannot speak at the hearing if you opt-out of the Settlement.

IF YOU DO NOTHING

25. What happens if I do nothing?

If you do nothing, you will not receive any benefit 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 Defendants or related parties about the issues involved in the Litigation, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

26. 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.StLouisUniversityDataIncident.com, or by writing to the SLU Data Incident Settlement Administrator, P.O. Box 3116, Baton Rouge, LA 70821.

27. How do I get more information?

Go to www.StLouisUniversityDataIncident.com, call [1-844-410-7258](tel:1-844-410-7258), or write to SLU Data Incident Settlement Administrator, P.O. Box 3116, Baton Rouge, LA 70821.

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