

**IMPORTANT NOTICE FROM THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**YOU MAY BE A CLASS MEMBER IN A PROPOSED CLASS ACTION SETTLEMENT IF YOU RESIDE IN THE
UNITED STATES AND MADE A PURCHASE ON THE BOMBAS WEBSITE FROM
NOVEMBER 11, 2016 THROUGH FEBRUARY 16, 2017.**

**The average payout is likely to be approximately \$47 per Settlement Class Member,
but the amount depends upon how many people submit valid claims.**

A proposed Settlement has been given preliminary approval in the class action lawsuit *Alex Pygin v. Bombas LLC, Shopify (USA) Inc., and Shopify Inc.*, United States District Court, Northern District of California, Case No. 4:20-cv-04412-JSW. The case is against Bombas LLC (“Bombas”), Shopify (USA) Inc., and Shopify Inc. (collectively “Defendants”) related to claims against Defendants arising out of or related to a security incident that affected Bombas’ computer systems from the period commencing on November 11, 2016 and continuing through February 16, 2017 (the “Security Incident”). The Security Incident was publicly disclosed by Bombas on or about June 3, 2020. Defendants deny all of the claims and deny that they did anything wrong.

Subject to the terms of the Settlement Agreement and the Court’s approval, Bombas will fund a \$225,000.00 Settlement Fund that will be used to pay all costs of the settlement, including: (i) payments to Settlement Class Members who submit valid claims; (ii) costs of Claims Administration (\$40,364.00); (iii) any attorneys’ fees and costs awarded by the Court to Class Counsel (\$56,250.00 plus costs of approximately \$10,000.00); and (iv) any service award to the Representative Plaintiff awarded by the Court (\$1,000.00). The Settlement also releases all claims of Settlement Class Members against Defendants arising out of or related to the Security Incident, as detailed in the Settlement Agreement.

Settlement Class Members can make a claim for one of two types of monetary Awards from the Settlement Fund, depending on how they were affected by the Security Incident. **If you are a Settlement Class Member and you want to receive an Award, you must complete and submit a Claim Form along with any required supporting information. Claim Forms can be found and completed on this website: www.BombasSettlement.com. The deadline to submit a Claim Form is November 9, 2021.**

Settlement Class Members may also request exclusion from the Settlement or object to it. Requests for exclusion are due by **October 12, 2021**. Settlement Class Members who do not request exclusion can object to the Settlement. Objections are due by **October 12, 2021**.

The Court will hold a Final Settlement Approval Hearing on **November 19, 2021** at the United States District Court for the Northern District of California, Oakland Division, located at 1301 Clay Street, Oakland, California 94612, to decide whether to approve the Settlement. The date of the Final Settlement Approval hearing may change without further notice. Please visit the Court’s website at <https://cand.uscourts.gov/> for current Court Operations and Safety Protocols information. At the Final Settlement Approval Hearing, the Court will consider whether the settlement is fair, reasonable, and adequate, consider any timely objections, and may consider Class Counsel’s request for attorneys’ fees of up to 25% of the Settlement Fund (or \$56,250.00), plus reasonable costs and expenses, and the request for service awards for the Representative Plaintiff (\$1,000.00).

The Court has appointed the following Class Counsel to represent the Settlement Class in this Lawsuit: M. Anderson Berry, Clayeo C. Arnold, A Professional Law Corporation, 865 Howe Avenue, Sacramento, CA 95825, 916-777-7777; and John A. Yanchunis, Morgan & Morgan Complex Litigation Group, 201 N. Franklin St., 7th Fl., Tampa, FL 33602, 813-223-5505.

You can find the full Class Notice, along with a full description of the proposed Settlement, related Court documents, dates and forms, and additional information on how Settlement Class Members can exclude themselves from the Settlement or object to it on this website: www.BombasSettlement.com, or by calling **844-963-277**. **DO NOT CONTACT THE COURT OR DEFENDANTS.**