# EXHIBIT 1

### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

IN RE: HERFF JONES	)	Master Case No. 1:21-cv-1329-TWP-DLP
DATA BREACH LITIGATION	)	
	)	Judge Tanya Walton Pratt
	)	Magistrate Judge Doris L. Pryor
	)	
	)	This Document Relates To All Actions

# <u>DECLARATION OF RYAN CHUMLEY OF ANGEION GROUP, LLC REGARDING</u> <u>SETLLEMENT ADMINISTRATION</u>

#### I, Ryan Chumley declare:

- 1. I am a Project Manager at the class action notice and settlement administration firm Angeion Group, LLC ("Angeion"), the Settlement Administrator retained in this matter, located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not party to this action. I have personal knowledge of the facts set forth herein.
- 2. Angeion was retained by the Parties and appointed by this Court to serve as Settlement Administrator and to, among other task, provide notice to potential Class Members; respond to Class Member inquiries; receive and process Class Member claim forms, exclusion requests and objections; and perform other duties as specified in the *Class Settlement Agreement and Release* or by the order(s) of the Court, including but not limited to the *Amended Order Granting Preliminary Approval of Class Action Settlement*, entered on January 12, 2022.
- 3. Angeion is not related to or affiliated with the Plaintiff's Counsel, Defendant or Counsel for Defendant.

#### CAFA NOTICE

4. Pursuant to 28 U.S.C. § 1715, Angeion, on behalf of Defendant, caused notice regarding the settlement to be sent to the Attorneys General of all states and territories, as well as the Attorney General of the United States on January 14, 2022 ("CAFA Notice"). As of the date of declaration, Angeion has not received an objection from any governmental agency. The CAFA Notice was in the same form as **Exhibit A** attached hereto.

#### **CLASS LIST**

- 5. On or about January 21, 2022, Angeion received from Defendant, three spreadsheets containing a total of 1,175,723 records containing: Class Member names and last known mailing addresses. Additionally, email addresses were provided for 1,148,882 records, purchase date was provided for 92,757 records and purchase amount was provided for 25,901 records.
- 6. Angeion reviewed the 1,175,723 records that were provided and removed duplicative records to compile the Class Member database ("Class List"). The deduplication efforts resulted in a total of 1,077,545 unique records.

#### EMAIL NOTICE

- 7. On February 28, 2022, Angeion caused the Email Notice to be sent to the 1,077,545 email addresses, of which 1,045,196 emails were delivered and 32,439 were not delivered due to either an invalid email address or a hard bounce. A true and accurate copy of the Email Notice is attached hereto as **Exhibit B**.
- 8. On April 5, 2022, Angeion caused the Reminder Email Notice to be sent to the 952,012 email addresses which had the initial Email Notice delivered and had not previously submitted a claim. 913,465 emails were delivered and 38,547 were not delivered due to a hard bounce. A true and accurate copy of the Reminder Email Notice is attached hereto as **Exhibit C**.

#### **DIRECT MAIL NOTICE**

- 9. Angeion processed the 1,077,545 mailing addresses through the United States Postal Service ("USPS") National Change of Address ("NCOA") database to identify updated addresses for individuals and businesses who have moved in the last four years and filed a change of address card with the USPS. The NCOA results provided 31,669 updated addresses for the Class Members. Angeion updated the Class List with these updated addresses.
- 10. On February 28, 2022, Angeion caused the Settlement Double Postcard Notice ("Notice") to be mailed to all 1,097,450 Class Members with a mailing address via United States Postal Service ("USPS") first class mail, postage prepaid. A true and accurate copy of the Postcard Notice is attached hereto as **Exhibit D**.

- 11. As of April 26, 2022, the USPS has returned 10,773 notices with a forwarding address. The Class List was updated with these addresses and Notices were re-mailed
- 12. As of April 26, 2022, a total of 26,800 of the initial Notices mailed have been returned by the USPS as undeliverable without a forwarding address. 19,342 of the 26,800 undeliverable Notices without a forwarding address were processed through address verification searches ("skip trace"). Of the 19,342 records subjected to a skip trace, a new address was located for 9,169 of them. Angeion updated the Class Member database and has re-mailed Notices to the 9,169 Class Members located via this process. Of the re-mailed Notices, 21 have been returned by the USPS a second time.
- 13. Of the 10,173 records subjected to a skip trace with no results, 9,462 were successfully sent a notice by email.
- 14. Pursuant to the undeliverable deadline as defined in paragraph 4.2(a) of the Settlement Agreement, 7,458 Notices were returned were not skip traced and re-mailed.
- 15. Of the 7,458 records returned after the undeliverable deadline, 6,933 were successfully sent a notice by email.

#### **CASE SPECIFIC WEBSITE**

16. On February 28, 2022, Angeion established the following website dedicated to this Settlement: <a href="www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> ("Settlement Website"). The Settlement Website contains an online portal where class members may submit a claim. Additionally, the Long Form Notice, Claim Form, Settlement Agreement, Preliminary Approval Order and other settlement related documents are available for download. The Settlement Website also has a "Frequently Asked Questions" page which provides Class Members with answers to common inquiries about the Settlement, and a "Contact Us" page which provides Class Members with the mailing address, phone number and email address to contact the Settlement Administrator. True and accurate copies of the Long Form Notice and Claim Form are attached hereto as **Exhibit E** and **Exhibit F** respectively.

17. As of April 26, 2022, the Settlement Website has had 82,347 unique visitors and 225,173 page views.

#### **CASE SPECIFIC HOTLINE**

18. On February 28, 2022, Angeion established a toll-free hotline dedicated to this Settlement to further apprise Class Members of their rights and options in the Settlement: 1-833-944-3141. The toll-free hotline utilizes an interactive voice response ("IVR") system to provide Class Members with responses to frequently asked questions and provide essential information regarding the Settlement. Class Members may also leave a message for the Settlement Administrator, provide updated contact information or ask additional questions and Angeion will call them back. This hotline is accessible 24 hours a day, 7 days a week. As of April 26, 2022 the case specific hotline has received 2,798 calls totaling 10,434 minutes.

#### CLAIM FORM SUBMISSIONS, REQUESTS FOR EXCLUSION AND OBJECTIONS

- 19. The deadline for Class Members to submit a Claim Form is May 12, 2022. As of April 26, 2022, Angeion has received 60,329 Claim Forms (115 via mail, 60,214 via the online portal). Angeion will continue to accept and process Claim Forms and will continue to inform the Parties of the number of Claim Forms received.
- 20. The deadline for Class Members to request exclusion from the Settlement was April 12, 2022. As of April 26, 2022, Angeion has received a total of 5 requests for exclusion. 2 of the exclusions received were submitted by individuals not identified on the Class List<sup>1</sup>. A table summarizing the exclusions received is attached hereto as **Exhibit G**.
- 21. The deadline for Class Members to object to the Settlement was April 12, 2022. As of April 26, 2022, Angeion has not received any objections to the Settlement.

#### **DISTRIBUTION AND REMAINING TASKS**

22. Angeion will continue to accept Claim Form submissions and replying to Class Member inquiries. Angeion will keep the Parties apprised of any additional, late exclusion requests or objections received.

<sup>&</sup>lt;sup>1</sup> The 2 exclusions from non-class members are spouses of class members. Therefore, there are a total of 3 valid exclusion requests.

23. Upon issuance of a Final Order from this Court and the achievement of the benchmarks set forth in the Settlement Agreement, Angeion will cause the distribution of Settlement benefits to take place in accordance with the terms of the Settlement Agreement or as otherwise directed by this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 26, 2022 at Philadelphia, Pennsylvania.

Ryan Chumley
Ryan Chumley

# Exhibit A



1650 Arch Street, Suite 2210 Philadelphia, PA 19103 www.angeiongroup.com 215.563.4116 (P) 215.525.0209 (F)

January 14, 2022

VIA USPS PRIORITY MAIL

United States Attorney General & Appropriate Officials

**Re: Notice of Class Action Settlement** *In Re Herff Jones Data Breach Litigation* 

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the Defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: In Re Herff Jones Data Breach Litigation

Index Number: No. 1:21-cv-01329

Jurisdiction: United States District Court, Southern District of Indiana, Indianapolis Division

Date Settlement Filed with Court: January 6, 2022

In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD-ROM:

- 1. 28 U.S.C. § 1715(b)(1)-Complaint: Complaint filed with the Court on May 25, 2021; Amended Complaint filed with the Court on July 26, 2021.
  - 2. 28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings: The Court has scheduled a Final Approval Hearing for July 18, 2022 at 2:00 p.m. in Room 344, United States District Court for the Southern District of Indiana, Courtroom 344, 46 East Ohio Street, Indianapolis, IN 46204 or by remote or virtual means as ordered by the Court.
  - **3. 28 U.S.C. § 1715(b)(3)-Notification to Class Members:** Proposed notifications to settlement class members of the proposed settlement of the class action and of settlement class members' rights to request exclusion from the class settlement, in the form of the Long Form Notice and Summary Notice filed with the Court on January 6, 2022.
- 4. 28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement: Class Action Settlement Agreement and Release, as well as a Redacted Supplemental Agreement to the Settlement Agreement, filed with the Court on January 6, 2022. Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and

the Memorandum in Support thereof (filed with the Court on January 6, 2022) and Plaintiffs' Unopposed Motion for Leave to File a Corrected Proposed Preliminary Approval Order (filed with the Court on January 11, 2022), are also included on the enclosed CD-ROM.

- 5. 28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements: Other than the Settlement Agreement and Supplemental Agreement to the Settlement Agreement filed with the Court, no other settlements or other agreements have been contemporaneously made between class counsel and counsel for the Defendant.
- **6. 28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.
- 7. 28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members: The Settlement Class contains approximately 1,000,000 Class Members located throughout the United States. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the submission of claim forms by Class Members as well as the elections that Class Members make on their claim forms and the information Class Members submit along with their claim forms, if any.
- 8. 28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement: The Court entered an order preliminarily approving the proposed class settlement and an order granting the parties' joint motion to file a redacted version of the Supplemental Agreement on January 7, 2022. The Court entered a corrected order preliminarily approving the proposed class settlement on January 12, 2022. Copies of those orders are included on the enclosed CD-ROM.

If you have questions or concerns about this notice, the proposed settlement, or the enclosed materials, or if you did not receive any of the above-listed materials, please contact this office.

Sincerely,

Angeion Group 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 (p) 215-563-4116

(f) 215-563-8839

**Enclosures** 

# Exhibit B

**From:** Notice of Herff Jones Data Breach Settlement. <donotreply@herffjonesclasssettlement.com> **Sent:** Monday, February 28, 2022 11:01 AM

To:

Subject: Notice of Herff Jones Data Breach Settlement

LEGAL NOTICE BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA

# **HERFF JONES DATA BREACH SETTLEMENT**

Name:

Notice ID:

Confirmation Code:

If you used a credit, debit, or other payment card for payment to Herff Jones, LLC between August 1, 2020 through April 30, 2021, you may be eligible for benefits from a data breach class action settlement.

A proposed settlement ("Settlement") has been reached in a lawsuit against Herff Jones, LLC ("Herff Jones"). The lawsuit claims that a data security incident occurred between August 1, 2020 and April 30, 2021 (the "Data Incident Period"), arising from a third-party criminal cyberattack involving the placement of malware targeting customers' payment card information (the "Data Incident"). Herff Jones denies these allegations. If approved by the Court, the Settlement resolves the case and provides benefits to Settlement Class Members that do not exclude themselves, including a monetary payment to Settlement Class Members who submit valid claims for out-of-pocket losses and lost time. This notice is only a summary. For more information, visit <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> or call 1-833-944-3141.

#### Who is included?

You may be a Settlement Class Member if you reside in the United States and your payment card information was exposed or potentially exposed in connection with the Data Incident, including if you were mailed a notification by or on behalf of Herff Jones between or around the period of May 12, 2021 through June 18, 2021 regarding the Data Incident.

#### What can I get?

The proposed Settlement creates a Settlement Fund of \$4.35 million to pay approved claims made by Settlement Class Members.

Settlement Class Members may submit a claim for one of the following awards: (a) \$75 for reimbursement to Settlement Class Members who attest that they used a credit, debit or other payment card at the Herff Jones website to make a purchase during the Data Incident Period; (b) \$25 per hour, up to a total of \$200, for Settlement Class Members who submit reasonable proof of a subsequent fraudulent charge on the payment card, and who attest that they spent at least some time addressing the fraudulent transaction or monitoring their account as a result of the Data Incident, and that the fraudulent charge was more likely than not caused by the Data Incident; or (c) up to \$5,000 for actual, documented, unreimbursed out-of-pocket expenses from the Data resulting Incident. Settlement Class Members may only receive one of the three above types of awards. If Settlement Class Members submit valid claims for multiple types of award, only the highestvalued claim filed will be processed and awarded. In addition to the above awards, any Settlement Class Members who were residents of the State of California during the Data Incident Period are eligible to receive an additional benefit of \$100 upon submitting a claim and attesting that they were a California resident at the time of Data Incident.

All benefits are subject to *pro rata* reduction as needed in the event that the total claims and other costs exceed the \$4.35 million Settlement Fund. Payments may also be increased on a *pro rata* basis, with a maximum payment under part (a) above of \$200, a maximum payment under part (b) above of \$400, a maximum payment under part (c) above of \$10,000, and a maximum payment to members of the California subclass described above of \$200. If there are funds remaining after these payments, the residual amount will be paid to a charitable recipient. Payment of attorneys' fees, costs, and the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement.

To be eligible to receive a monetary benefit under the Settlement, you must submit a Claim Form by May 12, 2022. You may file a claim online at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> or request and submit a paper claim form by calling 1-833-944-3141. If you have any questions about the Claim Form or how to file a claim, call 1-833-944-3141 or email info@HerffJonesClassSettlement.com.

#### What are my options?

If your private information was compromised, or potentially compromised in the Data Incident, you can (1) do nothing and receive no benefit; (2) seek reimbursement by submitting a Claim Form by May 12, 2022 <u>either</u> (a) attesting that you used a credit, debit or other payment card at the Herff Jones website to make a purchase during the Data

Incident Period; (b) providing proof you spent time addressing a fraudulent transaction on the payment card; or (c) submitting documentation of unreimbursed out-of-pocket expenses resulting from the Data Incident; (3) object to the Settlement by April 12, 2022; (4) exclude yourself by April 12, 2022. If you do not exclude yourself, and the Court approves the Settlement, you will be bound by the Court's orders and judgments and will release your claims against Herff Jones (including any that you have already initiated in any proceeding), even if you do not file a claim. For information on how to exclude yourself, object, or file a claim, visit www.HerffJonesClassSettlement.com or call 1-833-944-3141. The Court will hold a Final Approval Hearing on July 18, 2022 to decide whether to approve the Settlement. You may attend this hearing, but you do not have to. The time and date of this hearing may change without further notice to the Settlement Class, so please check the website for updates.

#### What happens next?

The Court, located in Indianapolis, Indiana, will hold a hearing on July 18, 2022 at 2:00 p.m. ET (or such other date as set by the Court) to decide whether to approve the Settlement, including how much to pay Class Counsel for their work in representing the Settlement Class (up to \$1,522,500 that will be paid out of the Settlement Fund) and what Service Award, if any, should be given to the Representative Plaintiffs. Class Counsel will also ask the Court to award the Presentative Plaintiffs up to \$2,500.00 (two thousand five hundred dollars) each, an amount which will be paid out of the Settlement Fund. You or your attorney may ask permission to speak at the hearing at your own cost. The date and time of this hearing may change without further notice to the Settlement Class. Please check www.HerffJonesClassSettlement.com for updates.

#### Who represents me?

The Court has appointed Bryan L. Bleichner of Chestnut Cambronne PA, Gary M. Klinger of Mason, Lietz, Klinger LLP, and Carl V. Malmstrom of Wolf, Haldenstein, Alder, Freeman, Herz LLC to represent you as 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. Bryan L. Bleichner may be contacted at 100 Washington Avenue South, Suite 1700, Minneapolis, MN 55401 or 1-612-339-7300. Gary M. Klinger may be contacted at 227 West Monroe Street, Suite 2100, Chicago, IL 60630 or 1-312-283-3814. Carl V. Malmstrom may be contacted at 111 West Jackson, Suite 1700, Chicago, IL 60604 or 1-312-984-0000.

#### How do I get more information?

For more information, including the Long Notice, Claim Form, Motion for Approval of Attorneys' Fees, and Settlement Agreement, call 1-833-944-3141 or visit <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>.

<u>Unsubscribe</u>

# **Exhibit C**

From: Notice of Herff Jones Data Breach Settlement <donotreply@herffjonesclasssettlement.com>

To: |

Sent: Tuesday, April 5, 2022 9:16 AM

Subject: Reminder Notice of Herff Jones Data Breach Settlement

LEGAL NOTICE BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA

### HERFF JONES DATA BREACH SETTLEMENT

Name:

Notice ID:

Confirmation Code:

If you used a credit, debit, or other payment card for payment to Herff Jones, LLC between August 1, 2020 through April 30, 2021, you may be eligible for benefits from a data breach class action settlement.

A proposed settlement ("Settlement") has been reached in a lawsuit against Herff Jones, LLC ("Herff Jones"). The lawsuit claims that a data security incident occurred between August 1, 2020 and April 30, 2021 (the "Data Incident Period"), arising from a third-party criminal cyberattack involving the placement of malware targeting customers' payment card information (the "Data Incident"). Herff Jones denies these allegations. If approved by the Court, the Settlement resolves the case and provides benefits to Settlement Class Members that do not exclude themselves, including a monetary payment to Settlement Class Members who submit valid claims for out-of-pocket losses and lost time. This notice is only a summary. For more information, visit www.HerffJonesClassSettlement.com or call 1-833-944-3141.

#### Who is included?

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All benefits are subject to *pro rata* reduction as needed in the event that the total claims and other costs exceed the \$4.35 million Settlement Fund. Payments may also be increased on a *pro rata* basis, with a maximum payment under part (a) above of \$200, a maximum payment under part (b) above of \$400, a maximum payment under part (c) above of \$10,000, and a maximum payment to members of the California subclass described above of \$200. If there are funds remaining after these payments, the residual amount will be paid to a charitable recipient. Payment of attorneys' fees, costs, and the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement.

To be eligible to receive a monetary benefit under the Settlement, you must submit a Claim Form by May 12, 2022. You may file a claim online at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> or request and submit a paper claim form by calling 1-833-944-3141. If you have any questions about the Claim Form or how to file a claim, call 1-833-944-3141 or email info@HerffJonesClassSettlement.com.

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#### What happens next?

The Court, located in Indianapolis, Indiana, will hold a hearing on July 18, 2022 at 2:00 p.m. ET (or such other date as set by the Court) to decide whether to approve the Settlement, including how much to pay Class Counsel for their work in representing the Settlement Class (up to \$1,522,500 that will be paid out of the Settlement Fund) and what Service Award, if any, should be given to the Representative Plaintiffs. Class Counsel will also ask the Court to award the Presentative Plaintiffs up to \$2,500.00 (two thousand five hundred dollars) each, an amount which will be paid out of the Settlement Fund. You or your attorney may ask permission to speak at the hearing at your own cost. The date and time of this hearing may change without further notice to the Settlement Class. Please check www.HerffJonesClassSettlement.com for updates.

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<u>Unsubscribe</u>

# **Exhibit D**

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA

# HERFF JONES DATA BREACH SETTLEMENT

If you used a credit, debit, or other payment card for payment to Herff Jones, LLC between August 1, 2020 through April 30, 2021, you may be eligible for benefits from a data breach

class action settlement.

:21-cv+013290TM/PBDORDEROEUM|ent168+dues Fillettle04\$29/222 c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103

Page 21 of 38 Pag FIRST-CLASS MAIL U.S. POSTAGE PAID MAG

> Electronic Service Requested



Postal Service: Please Do Not Mark Barcode

Notice ID: Confirmation Code:

T10 P2



9507



Name/Address Change (if necessary)

A proposed settlement ("Settlement") has been reached in a lawsuit against Herff Jones, LLC ("Herff Jones"). The lawsuit claims that a data security incident occurred between August 1, 2020 and April 30, 2021 (the "Data Incident Period"), arising from a third-party criminal cyberattack involving the placement of malware targeting customers payment card information (the "Data Incident"). Herff Jones denies these allegations. If approved by the Court, the Settlement resolves the case and provides benefits to Settlement Class Members that do not exclude themselves, including a monetary payment to Settlement Class Members who submit valid claims for out-of-pocket losses and lost time. This notice is only a summary. For more information, www.HerffJonesClassSettlement.com or call 1-833-944-3141.

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Settlement Class Members may only receive one of the three above types of awards. If Settlement Class Members submit valid claims for multiple types of award, only the highest-valued claim filed will be processed and awarded.

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21 Toyle Offilist A Gerit of Pair Penefity decrites a serify most submit a paper claim form by calling 833-944-3141. If you have any questions about the Claim Form or how to file a claim, call 833-944-3141 or email info@HerffJonesClassSettlement.com.

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If you do not exclude yourself, and the Court approves the Settlement, you will be bound by the Court's orders and judgments and will release your claims against Herff Jones (including any that you have already initiated in any proceeding), even if you do not file a claim. For information on how to exclude yourself, object, or file a claim, visit www.HerffJonesClassSettlement.com or call 1-833-944-3141. The Court will hold a Final Approval Hearing on July 18, 2022 to decide whether to approve the Settlement. You may attend this hearing, but you do not have to. The time and date of this hearing may change without further notice to the Settlement Class, so please check the website for updates.

#### What happens next?

The Court, located in Indianapolis, Indiana, will hold a hearing on July 18, 2022 at 2:00 p.m. ET (or such other date as set by the Court) to decide whether to approve the Settlement, including how much to pay Class Counsel for their work in representing the Settlement Class (up to \$1,522,500 that will be paid out of the Settlement Fund) and what Service Award, if any, should be given to the Representative Plaintiffs. Class Counsel will also ask the Court to award the Presentative Plaintiffs up to \$2,500.00 (two thousand five hundred dollars) each, an amount which will be paid out of the Settlement Fund. You or your attorney may ask permission to speak at the hearing at your own cost. The date and time of this hearing may change without further notice to the Settlement Class. Please check www.HerffJonesClassSettlement.com for updates.

#### Who represents me?

The Court has appointed Bryan L. Bleichner of Chestnut Cambronne PA, Gary M. Klinger of Mason, Lietz, & Klinger LLP, and Carl V. Malmstrom of Wolf, Haldenstein, Alder, Freeman, & Herz LLC to represent you as 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. Bryan L. Bleichner may be contacted at 100 Washington Avenue South, Suite 1700, Minneapolis, MN 55401 or 612-339-7300. Gary M. Klinger may be contacted at 227 West Monroe Street, Suite 2100, Chicago, IL 60630 or 312-283-3814. Carl V. Malmastrom may be contacted at 111 West Jackson, Suite 1700, Chicago, IL 60604 or 312-984-0000.

#### How do I get more information?

For more information, including the Long Notice, Claim Form, Motion for Approval of Attorneys' Fees, and Settlement Agreement, call 1-833-944-3141 or visit www.HerffJonesClassSettlement.com.



Postage Required Post Office will not deliver without proper postage.

# Exhibit E

#### NOTICE OF CLASS ACTION SETTLEMENT

#### SOUTHERN DISTRICT OF INDIANA

*In re: Herff Jones Data Breach Litigation*, Case No. 1:21-cv-01329-TWP-DLP (S.D. Ind.)

If you used a credit, debit, or other payment card for payment to Herff Jones, LLC between August 1, 2020 through April 30, 2021, you may be eligible for benefits from a data breach class action settlement.

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

- A settlement (the "Settlement") has been proposed with Herff Jones, LLC ("Defendant") in lawsuits asserting claims against Defendant relating to a data security incident that occurred between August 1, 2020 through April 30, 2021 (the "Data Incident Period"), arising from a third-party criminal cyberattack involving the placement of malware targeting customers' payment card information (the "Data Incident"). Defendant denies all of the claims. The Settlement does not establish who is correct and is not an admission of fault, but rather is a compromise to end the lawsuit.
- The Settlement includes, subject to certain limitations, all Persons residing in the United States whose Personal Information (as defined in the Settlement Agreement, found at <a href="www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>) was exposed or potentially exposed in connection with the Data Incident, including but not necessarily limited to all Persons who were mailed a notification by or on behalf of Herff Jones between or around the period of May 12, 2021-June 18, 2021 regarding the Data Incident (the "Settlement Class").
- The Settlement makes Settlement Class Members who submit valid claims eligible to receive cash payments, including for certain documented unreimbursed out-of-pocket expenses and time spent that resulted from the Data Incident.

# Your legal rights are affected even if you do nothing. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
Submit a Claim	This is the only way to get benefits under this Settlement.
Ask to be Excluded	Get no benefits. This is the only option that allows you to bring your own lawsuit against Defendant related to the Data Incident.
Object	Write to the Court about why you do not think the Settlement is fair, reasonable, or adequate.
Go to the Hearing	Ask to speak in Court about the fairness of the Settlement.
Do Nothing	Get no benefits from the Settlement. Give up rights to submit a claim for the Settlement benefits or to bring a different lawsuit against Defendant related to the Data Incident.

- 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 grant final approval of the Settlement. No cash payments will be made until after the Court grants final approval of the Settlement and all appeals, if any, are resolved.

#### BASIC INFORMATION

#### 1. Why is there a notice?

The Court authorized this notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give "final approval" to the Settlement. This notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Tanya Walton Pratt of the United States District Court for the Southern District of Indiana is overseeing this case known as *In re Herff Jones Data Breach Litigation*, Case No. 1:21-cv-01329. The people who brought the lawsuit are called the Plaintiffs. The company being sued, Herff Jones, LLC, is called the Defendant.

#### 2. What is this lawsuit about?

The lawsuit claims that Defendant was responsible for the Data Incident and asserts claims such as: negligence, negligence per se, declaratory judgment, and violations of the California Consumer Privacy Act and the Illinois Consumer Fraud and Deceptive Business Practices Act.

Defendant denies these claims and says it did not do anything wrong. No court or other judicial entity has made any judgment or other determination that Defendant has any liability on these claims or did anything wrong.

#### 3. Why is this lawsuit a class action?

In a class action, one or more people called class representatives or representative plaintiffs sue on behalf of all people who have similar claims. Together, all of these people are called a class, and the individuals are called class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

#### 4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to members of the Settlement Class ("Settlement Class Members"). The "Settlement Class Representatives" appointed to represent the Settlement Class, and the attorneys for the Settlement Class ("Settlement Class Counsel," see Question 18) think the Settlement is best for all Settlement Class Members.

#### WHO IS IN THE SETTLEMENT?

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

You are affected by the Settlement and potentially a member of the Settlement Class if you reside in the United States and your payment card information was exposed or potentially exposed in connection with the Data Incident, including if you were mailed a notification by or on behalf of Herff Jones between or around the period of May 12, 2021-June 18, 2021 regarding the Data Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Specifically excluded from the Settlement Class is any judge presiding over this matter and any members of their first-degree relatives, judicial staff, the officers and directors of Herff Jones, Settlement Class Counsel and their first-degree relatives, and Persons who timely and validly request exclusion from the Settlement Class.

#### 6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 833-944-3141 with questions. You may also write with questions to:

Herff Jones Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 info@HerffJonesClassSettlement.com

### THE SETTLEMENT BENEFITS-WHAT YOU GET IF YOU QUALIFY

### 7. What does the Settlement provide?

The Settlement provides that Defendant will fund the following payments up to a total of \$4,350,000: (a) \$75 for reimbursement to Settlement Class Members who attest that they used a credit, debit or other payment card at the Herff Jones website to make a purchase during the Data Incident Period; (b) \$25 per hour, up to a total of \$200 for Settlement Class Members who submit reasonable proof of a subsequent fraudulent charge on the payment card, and who attest that they spent at least some time addressing the fraudulent transaction or monitoring their account as a result of the Data Incident, and that the fraudulent charge was more likely than not caused by the Data Incident; or (c) up to \$5,000 for reimbursement of certain out of pocket expenses stemming from the Data Incident that were not reimbursed (see Question 8).

The Settlement also provides that Settlement Class Members who were residents of the State of California at the time their Personal Information was exposed or potentially exposed in the Data Incident are eligible for an additional benefit of \$100 upon submitting a claim and attesting that they were a California resident at the time of the Data Incident.

Such benefits are subject to pro rata reduction as needed in the event that the total claims exceed the \$4,350,000 cap on payments to be made by Defendant, and payments may also be increased on a pro rata basis, with a maximum payment under part (a) above of \$200, a maximum payment under part (b) above of \$400, a maximum payment under part (c) above of \$10,000, and a maximum payment to members of the California subclass described above of \$200. If there are funds remaining after these payments, the residual amount will not be returned to the Defendant but paid to a charitable recipient. Payment of attorneys' fees, costs and expenses (see Question 19) and the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement.

# 8. What payments are available for reimbursement of documented out-of-pocket expenses and time spent?

Settlement Class Members who do not submit a claim for a \$75 payment are eligible to receive:

- a) Reimbursement of actual, documented, unreimbursed out-of-pocket expenses resulting from the Data Incident (up to \$5,000 in total), such as:
  - late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, and/or card cancellation or replacement fees;
  - late fees from transactions with third parties that were delayed due to fraud or card replacement;
  - unauthorized charges on credit, debit or other payment cards that were not reimbursed;
  - parking expenses or other transportation expenses for trips to a financial institution to address fraudulent charges or receive a replacement payment card;
  - credit freeze fees or credit monitoring purchased for up to three years; and
  - other expenses that are reasonably attributable to the Data Incident that were not reimbursed; **or**
- b) Compensation for time spent addressing fraudulent transactions or monitoring an account as a result of the Data Incident, and that the fraudulent charge was more likely than not caused by the Data Incident as described in response to Question 7, up to the amount of \$200.00.

#### HOW DO YOU SUBMIT A CLAIM?

#### 9. How do I get a benefit?

To receive a benefit under the Settlement, you must complete and submit a claim for that benefit (a "Claim"). Every Claim must be made on a form ("Claim Form") available at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> or by calling 1-833-944-3141 . Read the instructions carefully, fill out the Claim Form, provide the required documentation, and submit it according to the instructions on the claim form.

#### 10. How will claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is valid. The Settlement Administrator may require additional information. If you do not provide the additional information in a timely manner the Claim will be considered invalid and will not be paid.

### 11. When will I get my payment?

The Court will hold a hearing on **July 18, 2022 at 2:00 p.m. ET** to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving them can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Please be patient.

#### WHAT DOES DEFENDANT GET?

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

If the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant and other persons ("Released Parties") as to all claims ("Released Claims") arising out of or relating to the Data Incident. This release is described in the Settlement Agreement, which is available at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>. If you have any questions you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

#### EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of this Settlement, but you want to keep the right to sue Defendant about the legal issues in this case, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as "opting out" of the Settlement Class.

#### 13. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself you will not be entitled to receive any benefits from the Settlement, but you will not be bound by any judgment in this case.

#### 14. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant (and any other Released Parties) for the claims that this Settlement resolves. You must exclude yourself from 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 exclude yourself, do not submit a Claim Form to ask for any benefit under the Settlement.

If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in this class action, you may want to consult an attorney and discuss whether any individual claim that you may wish to pursue would be time-barred by the applicable statutes of limitations or repose.

#### 15. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded from the Settlement in *In re Herff Jones Data Breach Litigation*, Case No. 1:21-cv-01329 (S.D. Ind.). The letter must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature or the original signature of a person authorized by law to act on your behalf; and (c) state unequivocally your intent to be excluded from the settlement. If your request for exclusion covers a payment card that includes co-signers or co-holders on the same payment card account, your

shall be deemed to be properly completed and executed as to that payment card only if all cosigners or co-holders elect to and validly opt-out. You must mail your exclusion request postmarked by **April 12, 2022,** to:

Herff Jones Data Breach Settlement Administrator Attn: Exclusion Request PO Box 58220 Philadelphia, PA 19102

#### **OBJECTING TO THE SETTLEMENT**

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

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. The Court will consider your views in its decision whether to approve the Settlement. The Court can only approve or deny the Settlement and cannot change the terms. To object, you must mail your objection to the Clerk of the Court, Settlement Class Counsel and Defendant's Counsel, at the mailing addresses listed below, postmarked by **no later** than the objection deadline, **April 12, 2022**:

Court	Defendant's Counsel
Clerk of the Court Birch Bayh Federal Building & U.S. Courthouse 46 East Ohio Street Indianapolis, IN 46204	Mark S. Mester Latham & Watkins LLP 330 North Wabash Avenue, Suite 2800 Chicago, Ill 60611
Settlement Class Counsel	
Bryan L. Bleichner Chestnut Cambronne PA 100 Washington Avenue South, Suite 1700 Minneapolis, MN 55401  Gary M. Klinger Mason, Lietz, & Klinger LLP 227 West Monroe Street, Suite 2100 Chicago, IL 60630  Carl V. Malmstrom Wolf, Haldenstein, Alder, Freeman, & Herz LLC 111 West Jackson, Suite 1700 Chicago, IL 60604	

Your objection must be written and must include all of the following: (i) your full name, address, telephone number, and e-mail address (if any); (ii) information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class; (iii) a statement as to whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire class; (iv) a clear and detailed written statement of the specific legal and factual bases for each and every objection, accompanied by any legal support for the objection the objector believes applicable; (v) the identity of any counsel representing you; (vi) a statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel, and, if through counsel, identifying that counsel; (vii) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objections and any documents to be presented or considered; and (viii) your signature and the signature of the your duly authorized attorney or other duly authorized representative (if any).

#### 17. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, you have no basis to object because you are no longer a member of the Settlement Class and the case no longer affects you. If you submit both a valid objection and a valid request to be excluded, you will be deemed to have only submitted the request to be excluded.

#### THE LAWYERS REPRESENTING YOU

#### 18. Do I have a lawyer in this case?

Yes. The Court appointed Bryan L. Bleichner, Gary M. Klinger and Carl V. Malmstrom as Settlement Class Counsel, to represent the Class in settlement negotiations. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### 19. How will the lawyers be paid?

Settlement Class Counsel will ask the Court for an award for attorneys' fees, costs and expenses up to \$1,522,500. Defendant has agreed to pay any award of attorneys' fees, costs and expenses up to that amount, to the extent approved by the Court. Any such award would compensate Settlement Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Settlement Class Counsel will also ask the Court for a service award up to \$2,500 each for Settlement Class Representatives.

Any award for attorneys' fees, costs and expenses for Settlement Class Counsel, and of service awards to the Settlement Class Representatives, must be approved by the Court. The Court may award less than the amounts requested. Settlement Class Counsel's papers in support of final approval of the Settlement will be filed no later than April 29, 2022 and their application for attorneys' fees, costs and expenses, and service awards will be filed no later than February 28, 2022 and will be posted on the settlement website.

#### THE COURT'S FAIRNESS HEARING

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

The Court will hold a Final Approval Hearing at 2:00 p.m. ET on July 18, 2022, at the Birch Bayh Federal Building & U.S. Courthouse, Courtroom 344, 46 East Ohio Street, Indianapolis, IN 46204 or by remote or virtual means as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees and reasonable costs and expenses, as well as the request for service awards for the Settlement Class Representatives. After the hearing the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Settlement Class Counsel recommend checking www.HerffJonesClassSettlement.com or calling 1-833-944-3141.

### 21. Do I have to attend the hearing?

No. Settlement Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to come to the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 16, the Court will consider it.

### 22. May I speak at the hearing?

You may ask the Court for permission to speak at the final fairness hearing. To do so, you must file an objection according to the instructions in Question 16, including all the information required. Your objection must be **mailed** to the Clerk of the Court, Settlement Class Counsel and Defendant's Counsel, postmarked no later than April 12, 2022.

#### IF YOU DO NOTHING

#### 23. What happens if I do nothing?

If you do nothing you will not get any money from this Settlement. If the Settlement is granted final approval and the judgment becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant and the other Released Parties based on any of the Released Claims, ever again.

#### **GETTING MORE INFORMATION**

#### 24. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at <a href="www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>. You may also call the Settlement Administrator with questions or to get a Claim Form at 833-944-3141.

# Exhibit F

**HRF** 

Herff Jones Data Breach Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103

Your Claim Form Must Be Submitted On or Before May 12, 2022

### In re: Herff Jones Data Breach Litigation

United States District Court for the Southern District of Indiana (Case No. 1:21-cv-1329-TWP-DLP)

#### **Claim Form**

#### SAVE TIME BY SUBMITTING YOUR CLAIM ONLINE AT WWW.HERFFJONESCLASSSETTLEMENT.COM

#### GENERAL CLAIM FORM INFORMATION

This claim form should be filled out online or submitted by mail if you used one or more debit, credit, or other payment cards directly or through an authorized Herff Jones sales partner organization between August 1, 2020 through April 30, 2021; and/or you incurred fraudulent charges on the same card and spent time addressing fraudulent charges or monitoring your account; and/or you experienced a documented, out-of-pocket, unreimbursed loss as a result of the data incident; and/or were a California resident at the time of the data incident.

The settlement notice describes your legal rights and options. Please visit the official settlement administration website, www.HerffJonesClassSettlement.com, or call 1-833-944-3141 for more information.

If you wish to submit a claim for a settlement payment, please provide the information requested below. Please print clearly in blue or black ink. This claim form must be mailed and postmarked by **May 12, 2022**.

#### TO SUBMIT A CLAIM FOR PAYMENT:

- 1. Complete all sections of this Claim Form.
- 2. Sign the Claim Form.
- 3. Provide Supporting Documentation, if required in Section 2.
- 4. Submit the completed Claim Form to the Class Administrator by May 12, 2022.

This Claim Form should only be used if a claim is being mailed and is not being filed online. You may go to <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a> to submit your claim online, or you may submit this Claim Form by mail to the address at the top of this form.

#### 1. CLASS MEMBER INFORMATION.

*First Name  *Last Name		Middle Initial  Suffix
		<del></del>
*Mailing Address: Street Address/P.O. Box (include Apartment/Suite	e/Floor Number)	· ·
*City		*State *Zip Code
*Current Email Address		
Current Phone Number (Optional)	*Settlement Clam ID	

Settlement Claim ID: Your Settlement Claim ID can be found on the postcard or Email Notice you received informing you about this Settlement. If you need additional help locating this ID, please contact the Settlement Administrator at 1 (833) 944-3141 or <a href="mailto:info@Herff]onesClassSettlement.com">info@Herff]onesClassSettlement.com</a>.

#### 2. PAYMENT ELIGIBILITY INFORMATION.

Please review the notice and sections 2.3 through 2.8 of the Settlement Agreement (available at <a href="www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>) for more information on who is eligible for a payment and the nature of the expenses or losses that can be claimed.

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

#### PLEASE PROVIDE THE INFORMATION LISTED BELOW:

Settlement Class Members who file a valid claim will be eligible for a Tier 1, Tier 2, **OR** Tier 3 award. Settlement Class Members will receive only one payment regardless of the number of credit or debit cards used by the Settlement Class Member on the Herff Jones website during the Data Incident. If more than one valid claim is submitted for a Settlement Class Member, the highest-valued valid claim will be processed and the remaining claims will be denied as duplicative. **Please be sure 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).

denied as duplicative. Please be sure to attach documentation of the charges as described in bold type (if you are asked to provide account statement part of proof required for any part of your claim, you may mark out any unrelated transactions if you wish).
Tier 1: Attested Card Use
I attest that I have used one or more personal debit or credit cards on the Herff Jones website during the Data Incident (August 1, 2020 to April 30 2021).
<b>Note:</b> Every Settlement Class Member who attests that they used one or more of their debit or credit cards on the Herff Jones website during the Data Incident (August 1, 2020 to April 30, 2021) is eligible to receive \$75.00, regardless of whether they experienced any fraudulent or unauthorized charges or whether they claim to have experienced any identity theft as a result of the Data Incident.
Tier 2: Lost Time
I attest that I have used one or more of my debit or credit cards on the Herff Jones website during the Data Incident (August 1, 2020 to April 30, 2 and can submit reasonable proof of subsequent fraudulent charges on the same credit or debit card that were more likely than not caused by the Data Incident. As a result of this, I have spent at least some time (max of 8 hours) addressing the fraudulent transactions or monitoring my account a result of the Data Incident.
<b>Examples</b> – You spent time calling customer service lines, writing letters or emails, on the Internet in order to get fraudulent charges reverse or updating automatic payment programs because your card number changed, etc. Please note that the time that it takes to fill out this Clair Form is not reimbursable and should not be included in the total.
Total number of hours spent on the Data Incident:
Briefly describe the time spent as a result of fraudulent charges caused by the data incident below. Please attach documentation to support the fraudulent charges you experienced.
You may mark out any transactions that were not fraudulent and any other information that is not relevant to your claim before sending in t documentation.
Note: Any Settlement Class Member who submits a claim for a Tier 2 Award and that claim is not approved or the portion of that claim that is approved is less than the amount the Settlement Class Member would otherwise receive as a Tier 1 Award will instead receive a Tier 1 Award.  Tier 3: Out-of-Pocket Loss  I attest that I have experienced an actual, documented, and unreimbursed monetary loss that was more likely than not caused by the Data Incident. I have made reasonable efforts to avoid, or seek reimbursement for the loss.  Losses may include, but are not limited to: unreimbursed fraudulent charges, bank fees, replacement card fees, late fees from transactions with third parties that were delayed due to fraud or card replacements, credit freeze fees, parking expenses or other transportation expenses for trips to a financial institution to address fraudulent charges or receive a replacement payment card, credit monitoring purchased for up to three years, or other expenses reasonably attributable to the Data Incident.
Total amount for this category: \$ .
Please provide copies of any receipts, bank statements, police reports, or other documentation supporting your claim. The settlement administrator may contact you for additional information before processing your claim.
You may mark out any information that is not relevant to your claim before sending in the documentation.
Description of the unreimbursed, out-of-pocket loss occurred and the documents attached to support this claim:

Note: Any Settlement Class Member who submits a claim for a Tier 3 Award and that claim is not approved or the portion of that claim that is approved is less than the amount the Settlement Class Member would otherwise receive as a Tier 1 Award will instead receive a Tier 1 Award.

#### **California Subclass**

In addition to the above benefits, California Settlement Subclass Members will also be eligible for an additional benefit of \$100 per California Settlement Subclass Member ("California Claim(s)"), subject to a potential pro rata reduction.

To redeem this \$100 benefit, California Settlement Subclass Members must submit a Settlement Claim and attest by checking the box below that they were a California resident at the time of the Data Incident.
I attest that I was a California resident at the time of the Data Incident (August 1, 2020 to April 30, 2021).

#### 3. 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 or Claims Referee before my claim will be considered complete and valid.		
Signature	Print Name	Date

#### **4. REMINDER CHECKLIST**

- 1. Complete all sections of this Claim Form.
- 2. Sign and date the Claim Form in Section 3.
- 3. Enclose supporting documentation if making a claim for a Tier 2 or Tier 3 Award.
- 4. Mail your completed Claim Form to the Settlement Administrator or submit your claim online at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>. Please keep a copy of your completed Claim Form for your records.
- 5. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form. You can update your contact information at <a href="https://www.HerffJonesClassSettlement.com">www.HerffJonesClassSettlement.com</a>.

# Exhibit G

Exclusion #	Name	Exclusion Date
1	LORI RUFFING	3/30/22
2	MARVIN SINDEL	4/13/22
3	ELON TURPIN	4/13/22
4	JOY SINDEL <sup>1</sup>	4/13/22
5	PATRICIA TURPIN <sup>1</sup>	4/13/22

 $<sup>^{\</sup>mathrm{1}}$  Exclusion Request submitted by individual not located on the Class List.