

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOUR PRIVATE INFORMATION WAS IMPACTED BY A DATA INCIDENT INVOLVING ALBION COLLEGE IN DECEMBER 2024, YOU MAY BE ELIGIBLE TO RECEIVE CREDIT MONITORING AND A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT.

This is an official Court-approved Notice authorized by the Circuit Court for Calhoun County, Michigan.

A proposed class action settlement has been reached in the lawsuit captioned: *Matthew Lane and Zachary Knapp v. Albion College*, Case No. 25-1301-NZ, pending in the Circuit Court for the County of Calhoun, State of Michigan.

If approved by the Court, the Settlement will resolve and release the legal claims (“Released Claims”) related to the unauthorized access to Albion College’s systems on or around December 17, 2024 (the “Data Incident”).

If you are a Settlement Class Member, this Settlement affects your legal rights. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM DEADLINE: SEPTEMBER 28, 2026	Submitting a Claim Form is the only way that you can receive Settlement Benefits. Only Settlement Class Members, <i>i.e.</i> , members of the Settlement Class who do not exclude themselves from the Settlement, are eligible to submit a Claim Form to receive Settlement Benefits. More information about submitting a Claim Form is available at FAQ #11.
EXCLUDE YOURSELF FROM THIS SETTLEMENT DEADLINE: AUGUST 29, 2026	Excluding yourself from the Settlement (or “opting out”) is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendant or other Released Parties for the claims this Settlement resolves. If you exclude yourself, you will give up the right to receive any Settlement Benefits. More information about excluding yourself is available at FAQ #17.
OBJECT TO THE SETTLEMENT DEADLINE: AUGUST 29, 2026	You may object to the Settlement by writing to the Court and informing it why you do not think the Settlement should be approved. You will still be bound by the Settlement if it is approved. If you exclude yourself from the Settlement, you <u>cannot</u> object to it; however, you may still submit a Claim Form to receive Settlement Benefits. More information about objecting is available at FAQ #20.
ATTEND THE FINAL APPROVAL HEARING OCTOBER 26, 2026	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 <u>not</u> required to attend the Final Approval Hearing. More information about the Court’s Final Approval hearing is available at FAQ #22.
DO NOTHING	If you do nothing, you will not receive any of the Settlement Benefits and you will give up any rights you may have to sue, continue to sue, or be part of another lawsuit against the Defendant and other Released Parties for the claims this Settlement resolves.

- 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 approve the Settlement. No Settlement Benefits will be provided unless the Court approves the Settlement, and it becomes final.

Questions? Visit www.AlbionDataSettlement.com or call toll-free 1-866-964-4299.

BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice to inform you of a proposed Settlement in this class action lawsuit. You have the right to understand the terms of the Settlement, as well as your rights and options, before the Court decides whether to grant final approval.

This Notice explains the nature of the lawsuit, the terms of the proposed Settlement, who is eligible to receive benefits from this Settlement, a description of the benefits, and how to obtain those benefits.

2. What is this lawsuit about?

The lawsuit is known as *Matthew Lane and Zachary Knapp v. Albion College*, Case No. 25-1301-NZ, pending in the Circuit Court for the County of Calhoun, State of Michigan (the “Action”).

Matthew Lane and Zachary Knapp are the Plaintiffs who brought this class action lawsuit against Albion College (referred to as “Albion” or “Defendant”) in response to the Data Incident. The specific legal claims alleged by the Plaintiffs can be viewed in the Amended Class Action Complaint, which is available on the Settlement Website, www.AlbionDataSettlement.com.

3. Why is this a class action?

In a class action lawsuit, one or more individuals (called the “Plaintiffs” or “Class Representatives”) bring claims on behalf of a larger group of people who have similar claims (the “Settlement Class” or “Settlement Class Members”). The Court resolves the claims for all Settlement Class Members, except for those who choose to exclude themselves from the Settlement Class. Under the Settlement, members of the Settlement Class who do not exclude themselves from the Settlement are referred to as “Settlement Class Members.”

4. Why is there a Settlement?

The Plaintiffs and the Defendant disagree over the legal claims made in this Action. The Action has not gone to trial, and the Court has not decided in favor of the Plaintiffs or Defendant (collectively referred to as the “Parties”). Instead, the Parties have agreed to settle the Action after considering the risks and uncertainties of continuing the lawsuit, and all factors related to the Settlement. The Parties believe that this Settlement is fair, reasonable, adequate, and in the best interests of themselves and the Settlement Class. The Settlement is not an admission of any wrongdoing.

WHO IS INCLUDED IN THE SETTLEMENT?

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

The Settlement Class includes all individuals who had Private Information impacted by the unauthorized access to Albion College’s systems on or around December 17, 2024 (the “Data Incident”). This includes all individuals who were sent a notice of the Data Incident.

If you received notice of this Settlement by mail, you are included in the Settlement Class.

Are there exceptions to individuals who are included in the Settlement Class?

Yes, excluded from the Settlement Class are: (i) Defendant (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Incident or who pleads nolo contendere to any such charge.

6. What if I am still not sure whether I am part of the Settlement?

Questions? Visit www.AlbionDataSettlement.com or call toll-free 1-866-964-4299.

If you are still not sure whether you are included in this Settlement, you can contact the Settlement Administrator for free assistance by calling toll-free 1-866-964-4299, emailing info@AlbionDataSettlement.com or writing to Albion College Data Incident Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Settlement Class Members are eligible to receive Credit Monitoring Services and one of two Cash Payment options. The aggregate cap on monetary benefits payable for Cash Payments is \$300,000. If the total value of Valid Claims for Cash Payments exceeds \$300,000, Cash Payments shall be reduced on a *pro rata* basis.

CREDIT MONITORING SERVICES

Includes three (3) years of one-bureau credit monitoring, \$1 million in identity theft protection insurance, CyberScan dark web monitoring, identity restoration services and lost wallet assistance.

CASH PAYMENT OPTION #1 (includes Cash Payment A and/or Cash Payment B benefits)

Cash Payment A - Ordinary Losses: Up to \$300.00 for ordinary documented losses for fraud and identity theft related to the Data Incident. Supporting documentation must be submitted. Losses that have previously been reimbursed are not eligible for payment under the Settlement.

Examples of ordinary documented losses include, but are not limited to:

- Unreimbursed costs, expenses, losses or charges incurred as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of a Settlement Class Member's Private Information.
- Unreimbursed costs incurred on or after May 1, 2025, associated with accessing or freezing/unfreezing credit reports with any credit reporting agency.
- Other unreimbursed miscellaneous expenses incurred related to any ordinary documented loss such as notary, fax, postage, copying, mileage, and long-distance telephone charges.
- Other mitigative costs fairly traceable to the Data Incident that were incurred on or after December 17, 2024, through the present.

Cash Payment B - Extraordinary Losses: Up to \$3,000.00 upon presentment of extraordinary documented losses related to the Data Incident if: (1) the loss is an actual, documented and unreimbursed monetary loss stemming from fraud, identity theft, or misuse arising out of or relating to the Data Incident; (2) the loss is fairly traceable to the Data Incident; (3) the loss occurred between December 17, 2024 and September 28, 2026; (4) the loss is not already covered by Cash Payment A; and (5) 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.

Documentation Requirement: Claims for **Extraordinary Losses** and **Ordinary Losses** must be submitted with documentation supporting the unreimbursed losses claimed. This can include receipts or other documentation that reflects the unreimbursed losses claimed and/or costs incurred. "Self-prepared" documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation.

CASH PAYMENT OPTION #2 (includes the Alternative Cash Payment)

Cash Payment C - Alternative Cash Payment: Settlement Class Members may elect to receive a cash payment in the amount of \$50.00 per person in lieu of claims for Ordinary or Extraordinary Losses. Supporting documentation is not required to submit a claim for an Alternative Cash Payment.

8. Are there other Settlement Benefits?

Yes. Albion College has also committed to making certain security enhancements and has agreed to pay for Settlement Administration Costs, Attorneys' Fees and Costs, and Service Awards. These costs are separate from, and do not affect the Settlement Benefits offered to the Settlement Class. Please visit www.AlbionDataSettlement.com for a full description of the Settlement Benefits.

9. What am I giving up in order to receive a Settlement Benefit or stay in the Settlement Class?

Unless you exclude yourself, you are choosing to remain in the Settlement Class as a Settlement Class Member. If the Settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Defendant and the other Released Parties about the legal issues in this Action, resolved by this Settlement, and released by the Settlement Agreement. The specific rights you are giving up are called Released Claims (*see* next question).

10. What are the Released Claims?

The Released Claims are defined as any and all actual, potential, filed or unfiled, known or unknown, fixed or contingent, claimed or unclaimed, suspected or unsuspected claims, demands, liabilities, rights, causes of action, damages, punitive, exemplary or multiplied damages, expenses, costs, indemnities, attorneys' fees and/or obligations, whether in law or in equity, accrued or unaccrued, direct, individual or representative, of every nature and description whatsoever, based on any federal, state, local, statutory or common law or any other law, against the Released Parties, or any of them, arising out of or relating to actual or alleged facts, transactions, events, matters, occurrences, acts, disclosures, statements, representations, omissions or failures to act relating to the Data Incident.

For more information, please refer to the Settlement Agreement, which is available at www.AlbionDataSettlement.com.

HOW TO GET SETTLEMENT BENEFITS—SUBMITTING A CLAIM FORM

11. How do I make a claim for Settlement Benefits?

Settlement Class Members must submit a claim in order to receive Settlement Benefits. Visit www.AlbionDataSettlement.com to submit a claim online or to download a full Claim Form to complete and return by mail. Claim Forms must be submitted online by **September 28, 2026**. Claim Forms submitted by mail must be postmarked no later than **September 28, 2026**.

Completed Claim Forms, along with supporting documentation may be mailed to the Settlement Administrator at:

Albion College Data Incident Settlement
Attn: Claim Forms
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Remember, Claim Forms submitted by mail must be postmarked no later than **September 28, 2026**.

12. Can I request a Claim Form?

Yes. Settlement Class Members can also request a Claim Form be mailed to them by calling toll-free 1-866-964-4299 or by writing to the Settlement Administrator.

Mail: Albion College Data Incident Settlement, Attn: Claim Request, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

Email: info@AlbionDataSettlement.com

13. What happens if my contact information changes after I submit a claim?

If you need to update your contact information after you submit a Claim Form, you may notify the Settlement Administrator of any changes by writing to the Settlement Administrator via mail or email. Please include your Notice ID number with any written requests to assist the Settlement Administrator in identifying you.

14. When and how will I receive the Settlement Benefits?

If you submit a valid claim for Credit Monitoring Services, the Settlement Administrator will send you an email with instructions on how to activate those services after the Settlement is approved and becomes Final. The email will be sent to

Questions? Visit www.AlbionDataSettlement.com or call toll-free 1-866-964-4299.

the email address that you provide on your Claim Form.

Cash Payments will also be issued by the Settlement Administrator only after the Settlement is approved and becomes Final. Cash Payments will be issued via the payment selection you made on the Claim Form. It is your responsibility to inform the Settlement Administrator of any updates to your payment information after the submission of your Claim Form.

The Settlement approval process may take time and there may be appeals that must be resolved before any Settlement Benefits can be issued. Please be patient and check www.AlbionDataSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed Leanna A. Loginov of Shamis & Gentile, P.A., and Sarah Soleiman of Strauss Borrelli as Class Counsel to represent you and all Settlement Class Members. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you.

Leanna A. Loginov SHAMIS & GENTILE P.A. 14 NE 1st Avenue, Suite 705 Miami, Florida 33132	Sarah Soleiman STRAUSS BORRELLI PLLC One Magnificent Mile 980 N Michigan Avenue, Suite 1610 Chicago IL, 60611
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16. How will Settlement Class Counsel be paid?

Class Counsel have undertaken this case on a contingency fee basis and have not been paid any money in relation to their work on this case to date. Class Counsel shall apply to the Court for an award of attorneys' fees and costs of up to \$237,500.00 for their work and time spent litigating this case and negotiating the Settlement. Class Counsel, on behalf of the Class Representatives, may seek Service Awards up to \$2,500.00 for each of the two Class Representatives. The Court may award less than these amounts. The amounts approved by the Court will be paid separately by the Defendant and will not affect the Settlement Benefits offered to Settlement Class Members.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a member of the Settlement Class and want to keep any right you may have to sue or continue to sue the Defendant and/or the other Released Parties on your own based on the claims raised in this Action or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement. Any member of the Settlement Class who does not file a timely Request for Exclusion in accordance with the instructions below will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.

17. How do I get out of the Settlement?

Settlement Class Members who want to exclude themselves or “opt-out” of the Settlement must submit an opt-out to the Settlement Administrator postmarked no later than **August 29, 2026**.

The opt-out request must be personally signed by the Settlement Class member and contain the requestor's name, address, telephone number, and email address (if any), and include a statement indicating a request to be excluded from the Settlement Class.

The opt-out must be postmarked or received by the Settlement Administrator at the address below no later than **August 29, 2026**:

Albion College Data Incident Settlement
Attn: Exclusions
P.O. Box 58220

Questions? Visit www.AlbionDataSettlement.com or call toll-free 1-866-964-4299.

If you opt-out of the Settlement, you will not receive any Settlement Benefits and you will have no right to object to the Settlement or to participate at the Final Approval Hearing. Any Settlement Class Member who does not timely and validly request to opt-out shall be bound by the terms of this Agreement even if that Settlement Class Member does not submit a Valid Claim.

18. If I exclude myself, can I still receive Settlement Benefits?

No. If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You are only eligible to receive Settlement Benefits if you stay in the Settlement and submit a valid Claim Form.

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

No. Unless you opt out of the Settlement, you give up any right to sue the Defendant and the other Released Parties for the claims that this Settlement resolves. You must exclude yourself from this Action to start or continue with your own lawsuit or be part of any other lawsuit against the Defendant or any of the other Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECT TO OR COMMENT ON THE SETTLEMENT

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

Settlement Class Members who wish to object to the Settlement and/or Application for Attorneys' Fees, Costs, and/or Service Awards must file their written objection with the Court, and sent by U.S. Mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator no later than **August 29, 2026**.

For an objection to be considered by the Court, the objection must also set forth:

- (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 number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;
- (d) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Award;
- (e) the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- (f) the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- (g) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (h) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- (i) the objector's signature (an attorney's signature is not sufficient).

COURT
Circuit Court Clerk 37th Circuit Court for Calhoun County, MI 161 E. Michigan Avenue Battle Creek, MI 49014-4066

SETTLEMENT CLASS COUNSEL	
Leanna A. Loginov SHAMIS & GENTILE P.A. 14 NE 1st Avenue, Suite 705 Miami, Florida 33132	Sarah Soleiman STRAUSS BORRELLI PLLC One Magnificent Mile 980 N Michigan Avenue, Suite 1610 Chicago IL, 60611
DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Paulyne Gardner Mullen Coughlin LLC 426 W. Lancaster Avenue, Suite 200 Devon, PA 19333	Albion College Data Incident Settlement Attn: Objections P.O. Box 58220 Philadelphia, PA 19102

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.

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel, including taking depositions and propounding document requests.

21. What is the difference between objecting and requesting exclusion?

Objecting is telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (that is, do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Class or the Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer affects you.

THE FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing on **October 26, 2026, at 3 p.m. ET** via Zoom.

The date and time of the Final Approval Hearing is subject to change without further notice to the Settlement Class, so please check www.AlbionDataSettlement.com for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also decide whether to enter a judgment approving the Settlement and whether to approve Class Counsel's award for Attorneys' Fees and Costs, and Service Awards to the Class Representatives.

If there are objections, the Court will consider them. The Court will also listen to people who have asked to speak at the hearing.

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 submit a timely and complete objection, the Court will consider it. You do not have to come to Court to talk about it.

Questions? Visit www.AlbionDataSettlement.com or call toll-free 1-866-964-4299.

24. May I speak at the Final Approval Hearing?

Yes. If you wish to attend and speak at the Final Approval Hearing, you must indicate this in your written objection (*see* Question 21). Your objection must state that it is your intention to appear at the Final Approval Hearing and must identify any witnesses you may call to testify or exhibits you intend to introduce into evidence at the Final Approval Hearing. If you plan to have your attorney speak for you at the Final Approval Hearing, your objection must also include your attorney's name, and whether they will be appearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive any Settlement Benefits. You will also give up certain rights, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or any of the other Released Parties about the legal issues in this Action and released by the Settlement.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.AlbionDataSettlement.com. You may also contact the Settlement Administrator by mail or email:

Mail: Albion College Data Incident Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

Email: info@AlbionDataSettlement.com

**PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE
TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**