

Notice of Proposed Class Action Settlement

In re: AllTrust Data Breach Litigation Case No. CACE-25-014963 (Fla. Cir. Ct., Broward Cnty.)

The Florida Circuit Court, Broward County authorized this Notice.

A proposed Settlement has been reached with Valsoft Corporation, Inc. d/b/a AllTrust Networks and Aspire USA, LLC (“Defendants”) arising out of cybersecurity incident involving Defendants resulting in the potential unauthorized access to or acquisition of Private Information that took place between February 12, 2024, and February 15, 2024 (the “Data Incident”). The case is known as *In re: AllTrust Data Breach Litigation*, CACE-25-014963, pending in the Florida Circuit Court, Broward County.

If you are an individual residing in the United States who was sent notice of the Data Incident indicating your Private Information may have been impacted in the Data Incident, your legal rights will be affected whether you act or do not act. You should read this entire Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
FILE A CLAIM FORM DEADLINE: MARCH 3, 2026	Submitting a Claim Form is the only way that you can receive any of the Settlement Class Member Benefits provided by this Settlement. If you submit a Claim Form, you will give up the right to sue Defendants or the Released Parties in a separate lawsuit about the legal claims this Settlement resolves.
EXCLUDE YOURSELF FROM THIS SETTLEMENT DEADLINE: MARCH 3, 2026	This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Defendants and Released Parties, for the claims this Settlement resolves. If you exclude yourself, you will give up the right to receive any Settlement Class Member Benefits.
OBJECT TO OR COMMENT ON THE SETTLEMENT DEADLINE: MARCH 3, 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 cannot object to it. If you object, you may also file a Claim Form to receive Settlement Class Member Benefits.
GO TO THE FINAL APPROVAL HEARING MARCH 16, 2026 9:30AM ET	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.
DO NOTHING	If you do nothing, you will not receive any of the Settlement Class Member Benefits and you will give up your rights to sue Defendants and 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 Class Member Benefits will be provided unless the Court approves the Settlement, and it becomes final.

Questions? Visit www.AllTrustDataIncidentSettlement.com or call toll-free 1-888-499-4241.

BASIC INFORMATION

1. Why did I get this Notice?

The Court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to receive those benefits.

The case is known as *In re: AllTrust Data Breach Litigation*, Case No. CACE-25-014963 (the “Action”), pending in the Florida Circuit Court, Broward County.

The individuals who filed this Action, Jolie Esparza, Rohenan Haynie, Gino Ortiz, Shely Foster, and Scott Smith, are called the “Plaintiffs” or “Class Representatives, and the companies they sued, Valsoft Corporation, Inc. d/b/a AllTrust Networks and Aspire USA, LLC, are called the “Defendants.”

2. What is this lawsuit about?

On or about February 14, 2024, Defendants became aware of suspicious activity related to an Aspire server and that third-party cybercriminals potentially gained access to Private Information. In response, Defendants launched an investigation which revealed that the unauthorized actor potentially accessed data that included the following personal information: name, Social Security number, driver’s license number, date of birth, government-issued identification number, financial account information, and email username and password.

On October 1, 2025, Plaintiffs filed a class action Complaint against Defendants in the Circuit Court of the 17th Judicial Circuit in and for Broward County, Florida, relating to the Data Incident alleging negligence, breach of implied contract, unjust enrichment, violation of California’s Unfair Competition Law, violation of the California Consumer Privacy Act, violation of the California Consumer Records Act, and declaratory judgment.

Defendants do not in any way acknowledge, admit to, or concede any of the allegations made in the Complaint, and expressly disclaim and deny any fault or liability, or any charges of wrongdoing that have been or could have been asserted in the Complaint. Visit www.AllTrustDataIncidentSettlement.com to view the Complaint.

3. Why is this a class action?

In a class action, one or more people called the “Plaintiffs”, or “Class Representatives” sue on behalf of all people who have similar claims. Together, all of these people are called a “Settlement Class” or “Settlement Class Members.” One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a Settlement?

The Plaintiffs and Defendants 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 Defendants (collectively referred to as the “Parties”). The Parties now agree to settle the Action entirely, without any admission by the Defendants of liability or wrongdoing.

Defendants have entered into the Settlement to resolve all controversies and disputes arising out of or relating to the allegations made in the Complaint and the Data Incident as it relates to it, and to avoid the litigation costs and expenses, distractions, burden, expense, and disruption to their business operations associated with further

litigation. Plaintiffs enter into the Settlement to recover on the claims asserted in the Complaint, and to avoid the risk, delay, and uncertainty of continued litigation.

WHO IS INCLUDED IN THE SETTLEMENT?

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

The **Settlement Class** includes all living individuals residing in the United States who were sent a notice of the Data Incident indicating their Private Information may have been impacted in the Data Incident.

The **California Settlement Subclass** includes Settlement Class Members residing in California who were identified as potentially having personally identifiable information accessed in the Data Incident.

The **Data Incident** refers to the cybersecurity incident involving Defendants resulting in the potential unauthorized access to or acquisition of Private Information that took place between February 12, 2024, and February 15, 2024.

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

Yes, excluded from the Settlement Class are (1) all persons who are directors, officers, and agents of Defendants, or their respective subsidiaries and affiliated companies; (2) governmental entities; and (3) the Judge assigned to the Action, that Judge's immediate family, and Court staff.

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

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.AllTrustDataIncidentSettlement.com or call toll-free 1-888-499-4241. You may also email the Settlement Administrator at Info@AllTrustDataIncidentSettlement.com.

THE SETTLEMENT CLASS MEMBER BENEFITS

8. What does the Settlement provide?

The following Settlement provides for the following benefits:

Credit Monitoring Services. Settlement Class Members shall be offered an opportunity to enroll in one year of CyEx's Financial Shield Pro with: (i) real time monitoring of the credit file with one credit bureau; (ii) dark web scanning with immediate notification of potential unauthorized use; (iii) security freezing assistance; (iv) victim assistance; (v) \$1,000,000.00 in identity theft insurance with no deductible; and (vi) access to fraud resolution agents to help investigate and resolve instances of identity theft.

Cash Payment A – Documented Losses. Settlement Class Members may submit a claim for a Cash Payment for up to \$2,500.00 per Settlement Class Member upon the presentment of **extraordinary documented losses related to the Data Incident.**

- 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.

- No payment shall be made for emotional distress, personal/bodily injury, or punitive damages, as all such amounts are not recoverable pursuant to the terms of the Settlement Agreement.
- The loss must have been more likely than not caused by the Data Incident, and must have occurred between February 14, 2024, and **March 3, 2026**.
- The Settlement Class Member must also have also 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.

Cash Payment B – Flat Cash. As an alternative to Cash Payment A above, a Settlement Class Member may elect to receive Cash Payment B, which is a flat cash payment in the estimated amount of \$25.00. The maximum amount payable to Settlement Class Members for Cash Payment B – Flat Cash shall be \$200,000.00. In the event the aggregate claimed amount of payments for Cash Payment B exceeds \$200,000.00, then the value of such payments shall be reduced on a *pro rata* basis, such that the aggregate value of all such payments does not exceed \$200,000.00.

California Statutory Claim Payment. In addition to Cash Payment A or B, California Settlement Subclass Members who submit a Valid Claim may also elect to receive the California Statutory Award in the amount of \$50.00. The maximum amount payable to Settlement Class Members for the California Statutory Claim Payment shall be \$100,000.00. In the event the aggregate claimed amount of payments for the California Statutory Claim Payment exceeds \$100,000.00, then the value of such payments shall be reduced on a *pro rata* basis, such that the aggregate value of all such payments does not exceed \$100,000.00.

9. Can I receive both Cash Payment types?

No. Settlement Class Members can select either Cash Payment A – Documented Losses **OR** Cash Payment B – Flat Cash. In addition to selecting one of the Cash Payment types, Settlement Class Members can also elect to receive Credit Monitoring. California Settlement Subclass Members can also elect to receive the California Statutory Award in addition to Credit Monitoring and one of the Cash Payment types.

10. What am I giving up to receive Settlement Class Member Benefits or to stay in the Settlement Class?

Unless you exclude yourself, you are choosing to remain in the Settlement Class. 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 Defendants 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).

11. What are the Released Claims?

Released Claims means any and all past, present, and future claims, demands, rights, actions or causes of action, liabilities, damages, losses, obligations, judgments, suits, penalties, remedies, matters, and issues of any kind or nature, whether known or unknown, contingent or absolute, existing or potential, suspected or unsuspected, disclosed or undisclosed, matured or unmatured, liquidated or unliquidated, legal, statutory, or equitable, in the Action or Related Actions, or in any court, tribunal, or proceeding by or on behalf of the Plaintiffs or any members of the Settlement Class, arising out of, or relating to the Data Incident, and which have been asserted or could have been asserted based on the facts alleged in this Action or the Related Actions against any of the Released Parties whether based on federal, state, local, statutory, common law, or any other law, rule or regulation, including the law of any jurisdiction outside the United States, against any or all of the Released Parties, which the Plaintiffs or any member of the Settlement Class ever had, now has, or hereinafter may have, prior to entry

of the final order and judgment in this Action or the Related Actions.

Complete information about the Released Claims and Released Parties is provided in the Settlement Agreement, available at www.AllTrustDataIncidentSettlement.com.

HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS— SUBMITTING A CLAIM FORM

12. How do I make a claim for Settlement Class Member Benefits?

Visit www.AllTrustDataIncidentSettlement.com to submit your claim online or to download a full Claim Form to complete and return it by mail. Claim Forms must be submitted online by **March 3, 2026**. Claim Forms submitted by mail must be postmarked no later than **March 3, 2026**.

Settlement Class members can also request a Claim Form by calling toll-free 1-888-499-4241 or by writing to the Settlement Administrator by mail or email:

AllTrust Data Incident Settlement
Attn: Claim Request
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Email: Info@AllTrustDataIncidentSettlement.com

13. Where do I send my completed Claim Form?

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

AllTrust 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 **March 3, 2026**.

14. What happens if my contact information changes after I submit a Claim Form?

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.

15. When and how will I receive the Settlement Class Member 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 becomes Final.

Cash Payments will be issued by the Settlement Administrator after the Settlement is approved and becomes Final. Cash Payments will be issued via the payment method selected 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 Class Member Benefits can be issued. Please be patient and check www.AllTrustDataIncidentSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes, the Court has appointed Andrew Shamis of Shamis & Gentile, P.A., Mariya Weekes of Milberg Coleman Bryson Phillips Grossman, and A. Brooke Murphy of Murphy Law Firm as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this Action.

17. How will Class Counsel be paid?

Class Counsel shall apply to the Court for an award of attorneys' fees and costs of up to \$600,000.00, to be paid by Defendants separate from Defendants' obligation to pay Settlement Administration Costs and the Settlement Class Member Benefits to Settlement Class Members.

In recognition of the time and effort the Class Representatives expended in pursuing this Action and in fulfilling their obligations and responsibilities as Class Representatives, and of the relief conferred on all Settlement Class Members by the Settlement, Class Counsel shall request a Service Award for each of the Class Representatives in an amount not to exceed \$2,500.00. If approved, the Service Awards shall be payable separate from the Settlement Class Member Benefits.

The Court may award less than these amounts.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class member and want to keep any rights you may have to sue or continue to sue the Defendants and/or the 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 Settlement Class Member 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.

18. How do I get out of the Settlement?

Settlement Class members who do not want to remain in the Settlement must submit an out-opt request.

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 opt-out of the Settlement Class. 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.

The opt-out request must be mailed so it is postmarked or received by the Settlement Administrator at the address below no later than **March 3, 2026**:

AllTrust Data Incident Settlement
Attn: Opt Outs
P.O. Box 58220
Philadelphia, PA 19102

Questions? Visit www.AllTrustDataIncidentSettlement.com or call toll-free 1-888-499-4241.

You cannot exclude yourself by telephone or by email.

19. If I exclude myself, can I still receive Settlement Class Member 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 Class Member Benefits if you stay in the Settlement and submit a valid Claim Form.

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

No. Unless you exclude yourself, you give up any right to sue the Defendants and the 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 Defendants 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

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

Settlement Class Members can object to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards.

Objections must be filed with the Court, and sent by U.S. Mail to Class Counsel, Defendants' Counsel, and the Settlement Administrator. For an objection to be considered by the Court, the objection must be submitted no later than **March 3, 2026**, and the Settlement Class Member must not have opted-out of the Settlement Class.

Court	Settlement Administrator
Central Courthouse Judicial Complex, West Building 201 S.E. 6th Street Fort Lauderdale, FL 33301 4th Floor, Room: 04130	AllTrust Data Incident Settlement Attn: Objections P.O. Box 58220 Philadelphia, PA 19102
Class Counsel	Defendant's Counsel
Andrew Shamis Shamis & Gentile, P.A. 14 NE 1st Ave, Suite 705 Miami, FL 33132 Mariya Weekes Milberg Coleman Bryson Phillips Grossman, PLLC 333 SE 2nd Avenue, Suite 2000 Miami, FL 33131 A. Brooke Murphy Murphy Law Firm 4116 Will Rogers Pkwy, Suite 700 Oklahoma City, OK 73108	Richard Haggerty Mullen Coughlin LLC 426 W. Lancaster Ave., Ste. 200 Devon, Pennsylvania 19333

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.

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 5 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 5 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 5 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).

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

22. 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 (opting out) 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

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

The Court will hold a Final Approval Hearing on **March 16, 2026 at 9:30 a.m. ET** via Zoom.

Virtual Zoom Courtroom Link: <https://17thflcourts.zoom.us/j/975531891>

Meeting ID: 975531891

Virtual Zoom Courtroom Telephone Number: (888) 475-4499

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

Questions? Visit www.AllTrustDataIncidentSettlement.com or call toll-free 1-888-499-4241.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement, Class Counsel's application for Attorneys' Fees and Costs, and a Service Award for 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.

24. 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, and you do not have to come to Court to talk about it.

25. 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, address, and phone number.

IF YOU DO NOTHING

26. 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 Class Member 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 Defendants or any of the other Released Parties about the legal issues in this Action and released by the Settlement Agreement.

GETTING MORE INFORMATION

27. 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.AllTrustDataIncidentSettlement.com. You may also contact the Settlement Administrator by mail or email:

AllTrust Data Incident Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Email: Info@AllTrustDataIncidentSettlement.com

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

Questions? Visit www.AllTrustDataIncidentSettlement.com or call toll-free 1-888-499-4241.