

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In re Consulting Radiologists Data Incident Litigation
Case No. 27-CV-24-9850
4th Judicial District Court of Hennepin County, Minnesota

IF YOUR PRIVATE INFORMATION WAS ACCESSIBLE IN THE CONSULTING RADIOLOGISTS' DATA INCIDENT DISCLOSED IN APRIL 2024, YOU ARE ELIGIBLE TO FILE A CLAIM FOR PAYMENT AND CREDIT MONITORING SERVICES FROM A CLASS ACTION SETTLEMENT. THIS INCLUDES IF YOU WERE PREVIOUSLY NOTIFIED BY CONSULTING RADIOLOGISTS, LTD ABOUT THE DATA INCIDENT.

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

Si necesita ayuda en español, comuníquese con el administrador al 1-844-484-4231.

- A settlement has been reached in a class action lawsuit against Consulting Radiologists, Ltd. ("CR" or "Defendant") concerning the cyberattack carried out by an unauthorized third party on CR's computer systems announced in April 2024, that resulted in the potential access of certain Private Information by unauthorized third parties (the "Data Incident").
- The lawsuit is called *In re Consulting Radiologists Data Incident Litigation*, No. 27-CV-24-9850, in the District Court for the State of Minnesota, County of Hennepin, 4th Judicial District (the "Litigation"). The lawsuit alleges that the Data Incident potentially exposed certain Private Information of Plaintiffs and the members of the putative class.
- The Settlement Class includes all individuals residing in the United States whose Private Information was accessible in the Consulting Radiologists' Data Incident disclosed in April 2024. It excludes: (1) the Judge presiding over this Litigation, and members of his direct family; (2) the Defendant and its current or former officers and directors; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.
- **Your legal rights are affected regardless of whether you act. Please read this notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM	This is the only way you may receive cash benefits or credit monitoring from this Settlement. The deadline to submit a Claim Form is March 2, 2026 .
EXCLUDE YOURSELF FROM THE SETTLEMENT	You will receive no payment, but you will retain any rights you currently have with respect to Defendant and the issues in this case. The deadline to exclude yourself from the Settlement is January 30, 2026 .

Questions? Visit www.CRDataSettlement.com or call 1-844-484-4231

OBJECT TO THE SETTLEMENT	Write to the Court explaining why you do not agree with the Settlement but remain bound by the Settlement. The deadline to object is January 30, 2026 .
ATTEND THE FINAL APPROVAL HEARING	You or your attorney may attend and speak about your objection at the Final Approval Hearing. The Final Approval Hearing will be held on February 25, 2026 .
DO NOTHING	You will not get any benefits from the Settlement, and you will give up certain legal rights. You will remain in the Settlement Class and be subject to the Release.

- These rights and options, and the deadlines to exercise them, are explained in this Notice. For complete details, please see the Settlement Agreement, whose terms control, available at www.CRDataSettlement.com.
- The Court in charge of this case still must decide whether to approve the Settlement. No Settlement benefits or payments will be provided unless the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. What is this Notice and why should I read it?

The Court authorized this Notice to inform you about a proposed Settlement with Defendant. The case is called *In re Consulting Radiologists Data Incident Litigation*, No. 27-CV-24-9850, in the District Court for the State of Minnesota, County of Hennepin, 4th Judicial District. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Settlement. This Notice explains the Litigation, the Settlement, and your legal rights.

2. What is a class action lawsuit?

A class action is a lawsuit in which one or more plaintiffs—in this case, Plaintiffs and Class Representatives Michael Ahner, Beckie Birkholz, Gina Bedard, Shay Forstrom, Chris Johnson, Nicole Johnson, Jean Kamrath, Pamela Koepsel, Anthony Malecha, Andrew Mathisen, Michael Montague, Sandy Montague, Alyson N. Moore, Deborah Pester, Gail Riemersma, Johns Sands, Joan Thomas, Sharen Van Den Heuvel, and John Wolf —sue on behalf of a group of people who they allege have similar claims. Together, after the court enters a class certification order, this group is called a “Class” and consists of “Class Members.” In a class action, the court resolves the issues for all class members, except those who exclude themselves from the class.

THE CLAIMS IN THE LITIGATION AND THE SETTLEMENT

3. What is this lawsuit about?

Plaintiffs claim that Defendant failed to implement and maintain reasonable security measures to adequately protect the Private Information in its possession and to prevent the Data Incident from occurring.

Defendant denies that it is liable for the claims made in the Litigation and denies all allegations of wrongdoing. More information about the complaint in the Litigation can be found on the Settlement Website, at www.CRDataSettlement.com.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or Defendant should win this case. Instead, both sides agreed to this Settlement. That way, they can avoid the uncertainty, risks, and expense of ongoing litigation, and Settlement Class Members will be eligible to get compensation now rather than years later—if ever. The Class Representatives and attorneys for the Settlement Class Members, called Class Counsel, agree the Settlement is in the best interests of the Settlement Class Members. The Settlement is not an admission of wrongdoing by the Defendant.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

You are part of the Settlement as a Settlement Class Member if you are an individual residing in the United States whose Private Information may have been accessed and/or acquired by an unauthorized party as a result of the Data Incident disclosed by Defendant in April 2024.

Settlement Class Members will have been emailed or mailed notice of their eligibility. If you are still not sure whether you are included, you can contact the Settlement Administrator by calling 1-844-484-4231, by emailing Info@CRDataSettlement.com, or by visiting the Settlement Website, at www.CRDataSettlement.com.

This Settlement Class does not include (1) the Judge presiding over this Action, and members of his direct family; (2) Defendant, and its current and former officers and directors; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

The Settlement provides for relief on a claims-made basis, attorneys' fees and costs subject to Court approval, and the costs of administration, subject to an aggregate cap of \$2,200,000.

All Settlement Class Members may claim up to three categories of relief described below: (A) reimbursement of actual Documented Monetary Losses; (B) Credit Monitoring Services; and (C) Cash Payment.

- A. Reimbursement of Documented Monetary Losses:** Settlement Class Members may claim reimbursement for associated monetary loss by submitting a claim along with supportive documentation for monetary losses ("Documented Monetary Loss"). To be eligible for reimbursement, Documented Monetary Losses, as further described below, must be fairly traceable to the Data Incident, and will be capped at \$5,000 per Settlement Class Member.

Supporting Documents: To receive reimbursement for any Documented Monetary Loss, Settlement Class Members must submit supporting documentation of the loss and a description of how the loss is fairly traceable to the Data Incident, if not readily apparent from the documentation. Documented Monetary Losses can be supported with the following evidence: receipts or other documentation not “self-prepared” by the Claimant that demonstrate the reasonable costs actually incurred by the Claimant. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but may be considered to add clarity or support other submitted documentation.

- i. Documented Monetary Losses:*** Settlement Class Members may submit a claim for documented out-of-pocket expenses incurred on or after February 1, 2024 through the Claims Deadline that are fairly traceable to the Data Incident, up to \$5,000 total per individual. Documented Monetary Losses may include, without limitation, the unreimbursed costs, expenses, losses or charges incurred as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of Private Information, credit monitoring costs, unreimbursed bank fees, long distance phone charges, postage, or gasoline for local travel. This list of reimbursable documented out-of-pocket expenses is not meant to be exhaustive, rather it is exemplary. Settlement Class Members may make claims for any documented unreimbursed out-of-pocket losses reasonably related to the Data Incident or to mitigating the effects of the Data Incident. The Claim Form and supporting documentation must demonstrate that: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Incident; (iii) the loss occurred between February 1, 2024 and the date of claim submission; (iv) the Claimant made reasonable efforts to avoid the loss or seek reimbursement for the loss, including, but not limited to, exhaustion of all available credit monitoring insurance and identity theft insurance. The Settlement Administrator shall have discretion to determine whether any claimed loss is reasonably related to the Data Incident.

- B. Credit Monitoring Services:** All Settlement Class Members may claim two years of CyEx’s single-bureau monitoring product, Identity Defense Complete. The product retails for \$19.99 per month.

The Settlement Administrator, from the Settlement funds to be provided by or on behalf of Defendant, will purchase/provide credit monitoring codes to all Settlement Class Members who submit a valid claim.

- C. Cash Payment:** All Settlement Class Members may claim a cash payment. Group 1 Settlement Class Members (those whose Social Security Number was accessible during the Data Incident) can claim a cash payment of up to \$125. Group 2 Settlement Class Members (all others whose Social Security Numbers were not accessible during the Data Incident) can claim a cash payment of up to \$50. Your individualized Notice indicates your Group, or you can find out which group you belong to by contacting the Settlement Administrator. Cash payments are subject to pro rata reduction as necessary to remain within the \$2,200,000 aggregate cap (which also covers court-approved attorneys’ fees and costs, service awards, approved documented losses, purchase of credit monitoring codes, and administration costs).

HOW TO GET BENEFITS

7. How do I make a Claim?

To qualify for credit monitoring or a cash benefit under the Settlement, you must submit a Claim Form. You may submit a Claim Form online at the Settlement Website www.CRDataSettlement.com. You may also mail a completed Claim Form to the Settlement Administrator. You may obtain a Claim Form through the Settlement Website at www.CRDataSettlement.com or by calling 1-844-484-4231.

All Claim Forms must be received (if submitted online) or postmarked (if mailed) no later than March 2, 2026.

8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled for **February 25, 2026**. If the Court approves the Settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will be sent payment after all appeals and other reviews, if any, are completed. Please be patient.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes, the Court has appointed Bryan L. Bleichner of Chestnut Cambronne PA, Anne T. Regan of Hellmuth & Johnson, Brian C. Gudmundson of Zimmerman Reed LLP, and E. Michelle Drake of Berger Montague as “Class Counsel” to represent you and all Settlement Class Members. You will not be charged for these lawyers. You can ask your own lawyer to appear in Court for you at your own expense if you want someone other than Class Counsel to represent you.

10. How will the lawyers be paid?

To date, Class Counsel has not received any payment for their services in conducting this litigation on behalf of the Class and have not been paid for their out-of-pocket expenses. Class Counsel will ask the Court for an award of attorneys’ fees and reimbursement of litigation costs not to exceed \$660,000.

Class Counsel will also request a service award payment of \$1,000 for each of the 19 Class Representatives.

The Court will determine the proper amount of any attorneys’ fees, costs, and expenses to award Class Counsel and the proper amount of any service awards to the Class Representatives.

Class Counsel will file their request for attorneys’ fees, costs, and expenses and service awards for the Class Representatives with the Court, which will also be posted on the Settlement Website, at www.CRDataSettlement.com.

11. What claims do I give up by participating in this Settlement?

If you do not exclude yourself from the Settlement, you will not be able to sue Defendant about the Data Incident and you will be bound by all decisions made by the Court in this case, the Settlement, and its included Release. This is true regardless of whether you submit a Claim Form. However, you may exclude yourself from the Settlement (*see* FAQs 13 and 14 below). If you exclude yourself from the Settlement, you will not be bound by any of the Released Claims, which are described in the Settlement Agreement available on the Settlement Website, at www.CRDataSettlement.com.

12. What happens if I do nothing at all?

If you do nothing, you will receive no benefits under the Settlement. You will be in the Settlement Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court, the Settlement, and its included Release. You will be deemed to have participated in the Settlement and will be subject to the provisions of the Settlement Agreement. Unless you exclude yourself, you won't be able to file a lawsuit or be part of any other lawsuit against Defendant for the claims or legal issues released in this Settlement.

13. What happens if I ask to be excluded?

If you exclude yourself from the Settlement, you will receive no benefits under the Settlement. However, you will not be in the Settlement Class and will not be legally bound by the Court's judgments related to the Settlement Class and Defendant in this Litigation.

14. How do I ask to be excluded?

You can ask to be excluded from the Settlement. To do so, you must send a written notification to the Settlement Administrator stating that you want to be excluded from the Settlement in *In re Consulting Radiologists Data Incident Litigation*, No. 27-CV-24-9850. Your written notification must include: (1) the name of the proceeding; (2) your full name and current address; (3) your signature; and (4) the words "Request for Exclusion" or a comparable statement that you not wish to participate in the Settlement at the top of the communication. You must mail your exclusion request, postmarked no later than **January 30, 2026**, to the following address:

CR Data Incident Settlement Administrator
Attn: Exclusion Requests
P.O. Box 58220
Philadelphia, PA 19102

You cannot exclude yourself by phone or email. Any individual who wants to be excluded from the Settlement must submit his or her own exclusion request. No group opt-outs shall be permitted.

15. If I don't exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant for the claims or legal issues released in this Settlement, even if you do nothing.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, do not submit a Claim Form to ask for any benefits.

17. How do I object to the Settlement?

If you do not exclude yourself from the Settlement Class, you can object to the Settlement if you do not agree with any part of it. You can give reasons why you think the Court should deny approval by filing an objection. To object, you must mail a written objection to the Settlement Administrator and file it with the Court stating that you object to the Settlement in *In re Consulting Radiologists Data Incident Litigation*, No. 27-CV-24-9850. Your objection must be filed no later than **January 30, 2026**.

The objection must be in writing and be personally signed by you. The objection must include: (i) the name of the proceedings; (ii) your full name, current mailing address, and telephone number; (iii) a statement of the specific grounds for the objection, as well as any documents supporting the objection; (iv) the identity of any attorneys representing you; (v) a statement regarding whether the you (or your attorney) intends to appear at the Final Approval Hearing; (vi) a statement identifying all class action settlements that you have objected to in the previous five years; and (vii) your signature and/or the signature of your attorney.

Written objections should be submitted to the Court at the address listed below:

Hennepin County District Court
Attn: Civil Filing
300 South 6th Street
Minneapolis, MN 55487

You must also mail the objection to the Settlement Administrator at the address listed below: postmarked no later than **January 30, 2026**:

CR Data Incident Settlement Administrator
Attn: Objections
P.O. Box 58220
Philadelphia, PA 19102

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court hold a hearing on the fairness of the Settlement?

The Court will hold the Final Approval Hearing on **February 25, 2026** at 8:30 a.m. CT via Zoom. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Settlement Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees, costs, and expenses and the service awards to Class Representatives.

You may attend the hearing via Zoom using the following Meeting URL:

<https://courts-state-mn-us.zoomgov.com/j/1617363268?pwd=SDZaQXNRVHRPaXFzRDQ5cEFhMU4xdz09>

Meeting ID: 161 736 3268

Passcode: 985976

The location, date and time of the Final Approval Hearing are subject to change by Court order. Any changes will be posted at the Settlement Website www.CRDataSettlement.com, or through the Court's publicly available docket. You should check the Settlement Website to confirm the date and time have not been changed.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. If your written objection was filed or mailed on time and meets the other criteria described in the Settlement, the Court will consider it. However, you may appear on your behalf or pay a lawyer to attend on your behalf to assert your objection if you would like.

21. May I speak at the hearing?

Yes. If you do not exclude yourself from the Settlement Class, you (or your attorney) may appear and speak at the Final Approval Hearing concerning any part of the proposed Settlement.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. More details may be found in the Settlement Agreement. You may view the Settlement Agreement and view answers to Frequently Asked Questions on the Settlement Website at www.CRDataSettlement.com.

You may also write to: CR Data Incident Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

PLEASE DO NOT CALL THE COURT, THE CLERK OF THE COURT, THE JUDGE, OR THE DEFENDANT WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.

Questions? Visit www.CRDataSettlement.com or call 1-844-484-4231