



**United States District Court  
Central District of California**  
*Lopez v. NLP, LLC, and NALS Apartment Homes LLC*  
Case No. 2:24-cv-06403-CV-SK



**This is an important Notice about a class action lawsuit.**

# Class Action Notice

***Authorized by the U.S. District Court***

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**Current and former employees of NLP, LLC or NALS Apartment Homes, LLC who reside in the U.S., and whose Personal Information was impacted by a Cybersecurity Incident identified in December 2023.**

**There is a Settlement of a lawsuit. You may be entitled to money.**

**To receive Settlement benefits, submit a Claim Form by April 3, 2026. To Opt Out of, or Object to the Settlement, you must take action by March 4, 2026. You can visit [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com) to learn more.**

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## Important things to know:

- If you take no action, you will still be bound by the Settlement, and your rights will be affected.
- You can learn more at: [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com).

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# About This Notice

## Why did I get this Notice?

This Notice is to tell you about a proposed Settlement that has been reached in a lawsuit entitled ***Daniel Lopez Jr. et al v. NLP, LLC, and NALS Apartment Homes LLC***, Case No. 2:24-cv-06403-CV-SK (C.D. Cal.). This Notice gives you a summary of the terms of the proposed Settlement Agreement, explains what rights Settlement Class Members have, and helps Settlement Class Members make informed decisions about what action to take.

## What do I do next?

Read this Notice to understand the Settlement and to determine if you are a Settlement Class Member. Then, decide if you want to:

Options	More information about each option
<b>Submit a Claim Form</b>	You must submit a Claim to receive Settlement benefits. You will be bound by the Settlement.
<b>Do Nothing</b>	Get no payment. Give up rights resolved by this Settlement.
<b>Opt Out</b>	Get no payment. This allows you to bring another lawsuit against the Defendants about the same legal issues resolved by this Settlement.
<b>Object</b>	Tell the Court why you don't like the Settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

## What are the most important dates?

Your deadline to **object** or **opt out**: **March 4, 2026**

Your deadline to submit a **Claim Form: April 3, 2026.**

Settlement Final Approval Hearing: **May 15, 2026 at 1:30 p.m. PST.**

## Learning About the Lawsuit

### What is this lawsuit about?

The lawsuit is about a Cybersecurity Incident that was identified on or around December 2, 2023, in which the Personal Information of current and former employees of the Defendants was potentially impacted. The lawsuit alleges that the Defendants failed to implement or follow reasonable data security procedures, and in doing so, violated the law. Plaintiff asserts eight different claims, including negligence, invasion of privacy, breach of implied contract, breach of fiduciary duty, breach of confidence, and alleged violation of the California Customer Records Act, the California Unfair Competition Law, and the California Consumer Privacy Act. The Defendants deny all claims alleged against them and deny all charges of wrongdoing or liability. The Defendants believe they adhered to reasonable data security procedures and assert multiple defenses, including Plaintiff's failure to allege any injury connected to the Cybersecurity Incident. The Settlement is not an admission of wrongdoing or an indication that the Defendants have violated any laws, but rather the resolution of disputed claims.

### Where can I learn more?

You can get a complete copy of the Settlement Agreement and other key documents in this lawsuit at:

**[www.LopezDataSettlement.com](http://www.LopezDataSettlement.com)**

### Why is there a Settlement in this lawsuit?

The Court did not decide in favor of the Plaintiff or the Defendants. Instead, a Settlement was negotiated that allows the Plaintiff, the proposed Settlement Class, and the Defendants to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. The Settlement provides benefits and allows Settlement Class Members to obtain payment for certain costs or losses and other benefits without further delay. Plaintiff and Class Counsel think the

Settlement is in the best interest of all Settlement Class Members.

This Settlement does not mean that the Defendants did anything wrong.

## What happens next?

The Court will hold a Final Approval Hearing to decide whether to approve the Settlement. The hearing will be held at:

**Where:** First Street Courthouse, Courtroom 10B, 350 W. 1<sup>st</sup> Street, Los Angeles, CA 90012.

**When: 1:30 p.m. PST on May 15, 2026.**

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court may also consider Class Counsel's request for an award of attorneys' fees and reimbursement of litigation costs and expenses, and the request for a Service Award for the Plaintiff.

The Court will take into consideration any timely submitted written objections and may also listen to anyone who has requested to speak at the hearing (see [Objecting](#) section below).

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the Settlement Class. To learn more and confirm the hearing date, go to [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com).

## What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money or other negotiated benefits to class members.

# Learning About the Settlement

## What does the Settlement provide?

The Settlement provides for the creation of a Settlement Fund in the amount of **\$435,000.00 (four hundred and thirty five thousand dollars and zero cents)** to pay for: (1) reimbursement for Out-of-Pocket Losses, Credit Monitoring Services, and Cash Compensation; (2) Notice and Administrative Expenses; (3) Fee Award and Costs as awarded by the Court; (4) Service Award Payment as awarded by the Court; and (5) Taxes and Tax-Related Expenses.

## How do I know if I am part of this Settlement?

You are a part of the Settlement and eligible to submit a Claim Form if you are a member of the Settlement Class.

The **Settlement Class** includes all current and former employees of Defendants who reside in the United States and whose information was impacted by the Cybersecurity Incident. **Cybersecurity Incident** refers to the cybersecurity incident identified on or about December 2, 2023 that affected Defendants' computer systems.

## Tell me more about the Settlement benefits

Settlement Class Members who submit a complete and Approved Claim Form on time are eligible to receive the following benefits (**You can request more than one benefit on your Claim Form**):

### Claims for Out-of-Pocket Losses.

A Settlement Class Member may seek Out-of-Pocket Losses up to a total of \$2,000 per claimant. A loss is an Out-of-Pocket Loss if it is:

- (1) An actual, unreimbursed monetary loss supported by an attestation that the Settlement Class Member believes the unreimbursed loss was incurred as a result of the Cybersecurity Incident; and
- (2) Supported by reasonable documentation, which may include credit card statements, invoices, telephone records, and receipts. Personal

certifications, declarations, or affidavits standing alone do not constitute reasonable documentation, but may provide clarification or context for other documentation that is submitted.

(3) Out-of-Pocket Losses may include the following unreimbursed losses:

- Miscellaneous costs such as bank fees, postage, copying, mileage, telephone charges, and notary charges; and
- Costs incurred as a result of purchasing credit monitoring or other identity theft insurance services between the date of the Cybersecurity Incident and end of the claims period.

### **Credit Monitoring Services**

A Settlement Class Member may submit a Claim for twenty-four (24) months of Credit Monitoring Services. Credit Monitoring Services will include credit monitoring through one of the national credit reporting bureaus.

### **Cash Compensation**

A Settlement Class Member may submit a Claim for cash compensation initially set at \$50.00 (“Cash Compensation”), which is subject to Pro Rata Increase or decrease as described below:

**Pro Rata Adjustment of Benefits.** If the total amount of Approved Claims for Out-of-Pocket Losses, Credit Monitoring Services, and Cash Compensation submitted during the Claims Period exceeds the amount of money available in the Settlement Fund, after payments for all other Settlement costs have been accounted for, the amount of each Approved Claim for Out-of-Pocket Losses and Cash Compensation will be reduced proportionally.

**Pro Rata Increase.** If the total amount of Approved Claims for Out-of-Pocket Losses, Credit Monitoring Services and Cash Compensation submitted during the Claims Period is less than the amount of money remaining in the Settlement Fund, after payments for all other Settlement costs as set forth the Settlement Agreement have been accounted for, then the Settlement Administrator will increase on a pro rata basis payments of the remaining money in the Settlement Fund to each Settlement Class Member that submitted an Approved Cash Compensation Claim.

# Deciding What to Do

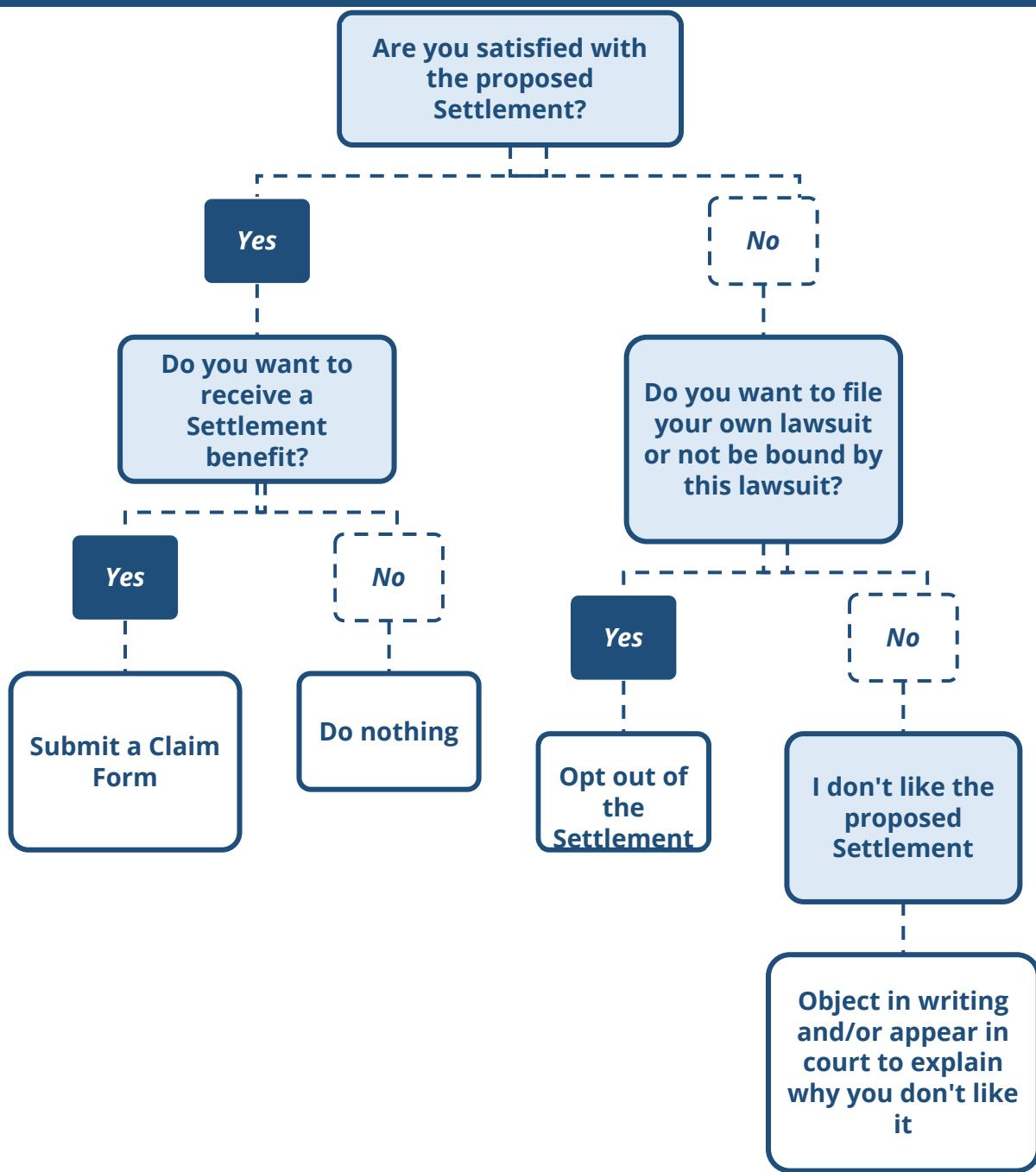
## How do I weigh my options?

You have four options. You can stay in the Settlement and submit a Claim, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt out	Object	Do Nothing
<b>Can I receive a Settlement benefit if I ...</b>	YES	NO	YES*	NO
<b>Am I bound by the terms of this Settlement if I ...</b>	YES	NO	YES	YES
<b>Can I pursue my own case if I ...</b>	NO	YES	NO	NO
<b>Will the class lawyers represent me if I ...</b>	YES	NO	NO	YES

**\*If you object, you still have to submit a Claim Form to receive Settlement benefits.**

## What is the best path for me?



# Submitting a Claim

## How do I get a Settlement benefit if I am a Settlement Class Member?

If you wish to receive a Settlement benefit, you must submit a completed Claim Form to the Settlement Administrator online or download a Claim Form at [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com) and mail to the Settlement Administrator at: Lopez Data Security Settlement, Attn: Claim Forms, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

You must submit your Claim Form **online no later than April 3, 2026**. Claim Forms mailed to the Settlement Administrator must be **postmarked no later than April 3, 2026**.

## Do I have a lawyer in this lawsuit?

In a class action, the court appoints lawyers to work on the case and represent the interests of all the class members. For this Settlement, the Court has appointed the following individuals and lawyers.

**Your lawyers:** Joshua Swigart of Swigart Law Group APC and Ben Travis of Ben Travis Law, APC. These are the lawyers who negotiated this Settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

## Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request an award of attorneys' fees not to exceed 25% of the Settlement Fund plus litigation costs.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the Settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$4,000 to the Plaintiff for the time and effort contributed to the case. If approved by the Court, this will be paid from the Settlement Fund.

## Opting Out

### What if I don't want to be part of this Settlement?

You can opt out. If you do, you will not receive any Settlement benefits and cannot object to the Settlement. However, you will not be bound or affected by the terms of this Settlement and may be able to file your own case.

### How do I opt out?

To opt out of the Settlement (also called requesting exclusion from the Settlement), you must mail your opt out request to the Settlement Administrator so it is **postmarked no later than March 4, 2026**.

Lopez Data Security Settlement  
Attn: Opt Outs  
P.O. Box 58220  
Philadelphia, PA 19102

The opt out request must include the name of the proceeding, the individual's full name, current address, personal signature, and the words "Request for Exclusion" or a comparable statement that the individual does not wish to participate in the Settlement at the top of the communication.

*No person shall purport to exercise any exclusion rights of any other person, or purport (a) to opt out Settlement Class Members as a group, in the aggregate, or as a class involving more than one Settlement Class Member; or (b) to opt out more than one Settlement Class Member on a single paper, or as an agent or representative. Any such purported Requests for Exclusion shall be void, and the Settlement Class Member(s) who is or are the subject of such purported Requests for Exclusion shall be treated as a Settlement Class Member and be bound by this*

*Settlement Agreement, including the Release contained herein, and judgment entered thereon, unless he or she submits a valid and timely Request for Exclusion.*

## Objecting

### What if I disagree with the Settlement?

If you disagree with any part of the Settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the Settlement Class, or the entire Settlement Class. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that includes:

- (1) The name of the proceedings;
- (2) The Settlement Class Member's full name, current mailing address, and telephone number;
- (3) A statement that states with specificity the grounds for the objection, as well as any documents supporting the objection;
- (4) A statement as to whether the objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- (5) The identity of any attorneys representing the objector;
- (6) A statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing;
- (7) A list of all other matters in which the objecting Settlement Class Member and/or his/her attorney has lodged an objection to a class action settlement; and

(8) The signature of the Settlement Class Member or the Settlement Class Member's attorney.

Your written objection must be **filed with the Court no later than March 4, 2026:**

United States District Court for the Central District of California  
First Street Courthouse  
350 W. 1<sup>st</sup> Street  
Los Angeles, CA 90012

## Doing Nothing

### What are the consequences of doing nothing?

If you do nothing, you will not receive any Settlement benefits, but you will still be bound by the Settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against the Defendants about the legal issues resolved by the Settlement. A full description of the claims and persons who will be released if this Settlement is approved can be found in the Settlement Agreement located on the Settlement Website: [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com).

## Key Resources

### How do I get more information?

This Notice is a summary of the proposed Settlement. The complete Settlement with all its terms can be found at [www.LopezDataSettlement.com](http://www.LopezDataSettlement.com). If you have additional questions, you can visit the Settlement Website, contact the Settlement Administrator or contact Class Counsel.

Resource	Contact Information
Case website	<a href="http://www.LopezDataSettlement.com">www.LopezDataSettlement.com</a>

<b>Settlement Administrator</b>	Lopez Data Security Settlement c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 <b>1-888-282-4115</b> <a href="mailto:Info@LopezDataSettlement.com"><u>Info@LopezDataSettlement.com</u></a>
<b>Your Lawyers</b>	<p>Joshua B. Swigart <b>SWIGART LAW GROUP, APC</b> 2221 Camino Del Rio S., Suite 308 San Diego, CA 92108 <a href="mailto:josh@swigartlawgroup.com"><u>josh@swigartlawgroup.com</u></a> 1-866-219-3343</p> <p>Ben Travis <b>BEN TRAVIS LAW, APC</b> 4660 La Jolla Village Drive, Suite 100 San Diego, CA 92122 <a href="mailto:ben@bentravislaw.com"><u>ben@bentravislaw.com</u></a> (619) 353-7966</p>