

**Superior Court for the State of California
County of Los Angeles**

Winzig v. Stockpile, Inc. and Stockpile Investments, Inc.
Case No. 21STCV45067



This is an important notice about a class action lawsuit.

Class Action Notice

Authorized by the Superior Court of the State of California

If your personal information was compromised in the 2020 Data Breach perpetrated against Stockpile Inc. and Stockpile Investments, Inc.



**There is a \$600,000 settlement of a lawsuit.
You may be entitled to money.
Visit
StockpileDataSettlement.com
to learn more.**



**To receive a Settlement payment, submit a Claim Form by October 6, 2026.
To Opt Out of, or Object to the Settlement, you must take action by October 6, 2026.**

Important things to know:

- If you are a Settlement Class Member and you take no action, any ruling from the Court will apply to you, and you will not be able to sue the Defendants for the same issues.
- The Court will hold a hearing on November 10, 2026 at 10:00 a.m. to decide whether to approve the Settlement.
- This notice is only a summary. You can learn more by scanning the QR code, visiting www.StockpileDataSettlement.com or calling toll-free 1-844-747-4126.

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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 **Winzig v. Stockpile, Inc. and Stockpile Investments, Inc.**, Case No. 21STCV45067, pending in the Superior Court of the State of California, County of Los Angeles. This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps 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 class member. Then, decide if you want to:

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

Read on to understand the specific options under the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to **object** or **opt out**: **October 6, 2026**
Your deadline to submit a **claim form**: **October 6, 2026**
Settlement Final Approval Hearing: **November 10, 2026 at 10:00 a.m.**

Learning About the Lawsuit

What is this lawsuit about?

(1) The lawsuit alleges that Stockpile, Inc. and Stockpile Investments, Inc.'s ("Stockpile" or "Defendants") inadequate cybersecurity resulted in a 2020 data breach that exposed and compromised the sensitive personal information of the Plaintiff and members of the Class. The Defendants deny all claims alleged against them and deny all charges of wrongdoing or liability. 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:
StockpileDataSettlement.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 members of the 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 Class Members to obtain a payment without further delay. Plaintiff and Class Counsel think the Settlement is in the best interest of all Class Members.

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.

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: Los Angeles Superior Court, Spring Street Courthouse,
Department 7 at 312 North Spring Street, Los Angeles, CA 90012

When: 10:00 a.m. on November 10, 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 expenses and the request for a Service Payment 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 Class. To learn more and confirm the hearing date, go to www.StockpileDataSettlement.com.

Learning About the Settlement

What does the settlement provide?

The Settlement provides for the creation of a Settlement Fund in the amount of **\$600,000.00** to pay for: (1) Individual Class Payments for Participating Class Members; (2) Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment; (3) Administration Expenses Payment (up to \$47,500); and (4) Class Representative Service Payment.

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 Class.

The **Class** includes all individuals whose personal information was compromised in the 2020 Data Breach perpetrated against the Defendants.

The Class specifically **excludes**: (a) Defendants and their employees, principals, officers, directors, agents, affiliated entities, legal representatives, successors and assigns; (b) the judges to whom this lawsuit has been or is assigned and any members of their immediate families; and (c) all persons who have filed a timely Request for Exclusion from the Class.

Tell me more about the Settlement Benefits

Class Members who submit a complete and valid claim form on time are eligible to receive a *pro rata* share of the Net Settlement Amount.* Those funds will then be divided equally amongst the Participating Class Members who submit a timely and valid Claim Form, capped at \$90 ("Individual Class Payments").

**The Net Settlement Amount means the Gross Settlement Amount (\$600,000), less any amount approved by the Court for: Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, Class Representative Service Payment, and the Administration Expenses Payment.*

Participating Class Members will have 180 calendar days from the Award Issuance Date to cash or redeem their Individual Class Payment or it will become void. Any funds remaining from uncashed or cancelled Individual Class Payments, or from the Net Settlement Amount after all Class Members' claims have been paid, will be transmitted to Privacy Rights Clearinghouse, the Court-approved nonprofit organization that is dedicated to data privacy education and advocacy, and therefore furthers the purposes of the lawsuit.

Remedial Measures. Stockpile represents that it has taken several remedial measures since the 2020 Data Breach occurred to further enhance its security posture. These include tightening its role-based access protocols; resetting passwords and rotating security keys; enhancing Secure Shell ("SSH") connection protocols; and introducing new password rotation and reset functionalities. Stockpile also continues to review and enhance its ongoing monitoring of its environment and applicable third-party environments, as well as to review its policies and procedures related to data security.

Deciding What to Do

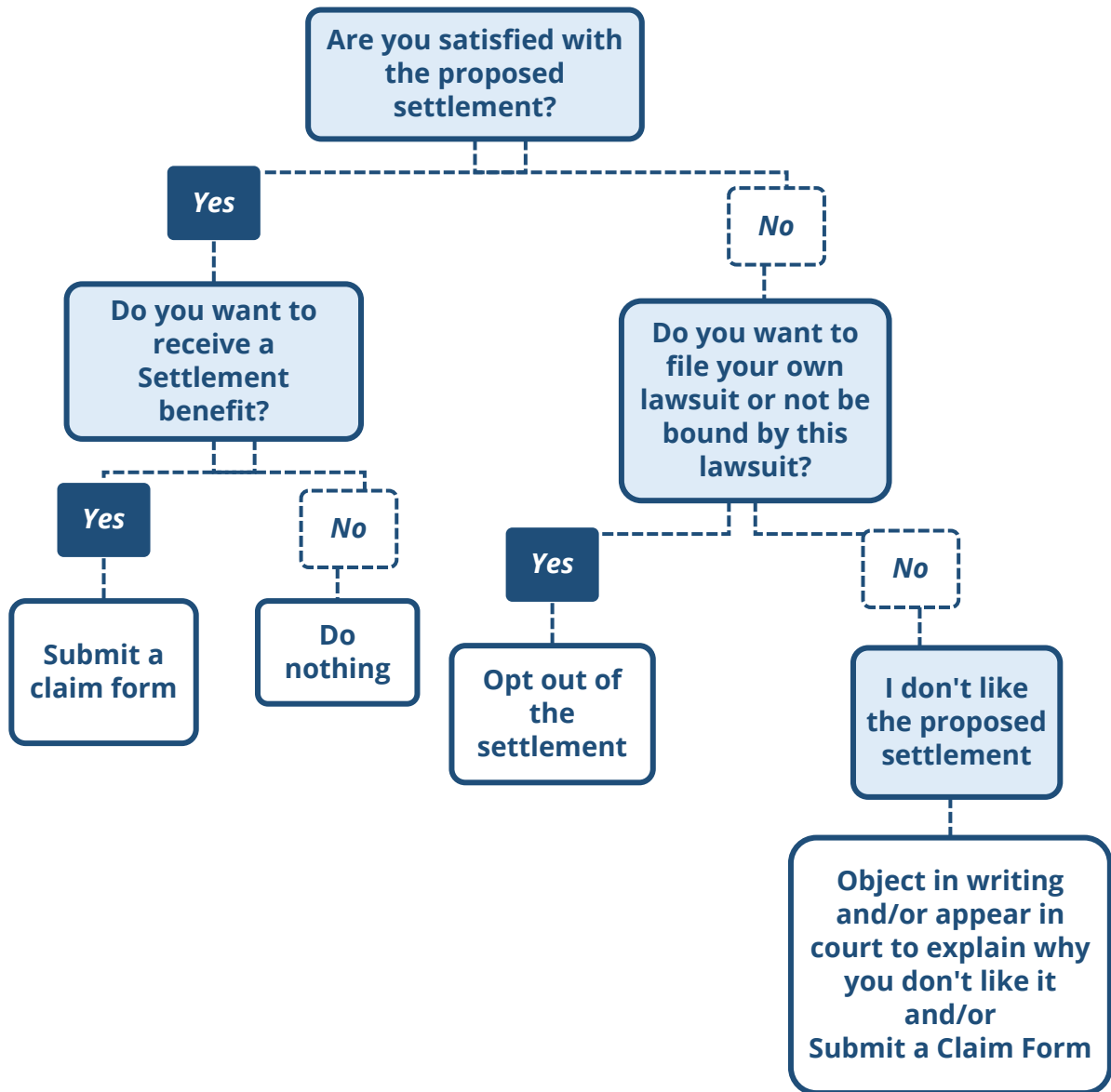
How do I weigh my options?

If you are a Class Member, 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
Can I receive a Settlement payment if I ...	YES	NO	YES*	NO
Am I bound by the terms of this lawsuit if I...	YES	NO	YES	YES
Can I pursue my own case if I...	NO	YES	NO	NO
Will Class Counsel represent me if I...	YES	NO	NO	YES

***IMPORTANT: If you object to the Settlement, you still have to submit a Claim Form to be eligible to receive a payment from the Settlement.**

What is the best path for me?



Submitting a Claim

How do I get a Settlement payment if I am a class member?

If you wish to receive a payment from the Settlement, you must submit a completed claim form online at www.StockpileDataSettlement.com no later than October 6, 2026. You can also download a claim form at www.StockpileDataSettlement.com and mail to the Administrator at: Stockpile Data Settlement Administrator, Attn: Claim Forms, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. Claim forms mailed to the Administrator must be

postmarked no later than **October 6, 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 lawyers below to represent the Class.

Your lawyers: Jeffrey A. Koncius of Kiesel Law LLP and Dean J. Zipser and Mark A. Finkelstein of Umberg Zipser LLP.

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?

Class Counsel's fees and expenses will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, Class Counsel 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, Class Counsel will request an award for Class Counsel Fees Payment not to exceed 33 1/3 % of the Settlement Fund, which is currently estimated to be \$200,000, and a Class Counsel Litigation Expenses Payment of not more than \$29,000. Class Counsel have agreed to divide any fees awarded based on set percentages to each firm.

Class Counsel's payments will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to Class Counsel's payments even if you think the Settlement terms are fair.

Class Counsel will also ask the Court to approve a Class Representative Service Payment in the amount of \$5,000 to the Plaintiff for the time and effort contributed to the case. If approved by the Court, the award for the Class Representative Service Payment 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 payment and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit 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), your opt out request must be mailed to the Administrator so it is postmarked no later than **October 6, 2026**.

Stockpile Data Settlement Administrator
Attn: Opt Outs
P.O. Box 58220
Philadelphia, PA 19102

A Request for Exclusion is a letter from a Class Member or his/her/their representative that reasonably communicates the Class Member's election to be excluded from the Settlement and includes the Class Member's name, address and email address or telephone number.

Objecting

What if I disagree with the Settlement?

If you disagree with any part of the Settlement (including the Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment and/or the Class Representative Service Payment) and do not opt out, you may object. You can give reasons why you think the Court should not approve it. 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 Administrator that includes all of the following information:

- 1) Your personal signature as the objector;
- 2) Your full name and current address;
- 3) An explanation of the basis upon which you claim to be a Settlement Class Member;
- 4) All grounds for the objection, including all citations to legal authority and evidence supporting the objection;
- 5) The name and contact information of any and all lawyers representing, advising, or in any way assisting you in connection with the preparation or submission of the objection or who may profit from the pursuit of the objection;
- 6) You may include a statement indicating whether you intend to appear at the Final Approval Hearing (either personally or through your lawyer who files an appearance with the Court in accordance with the Local Rules), though the Court generally will hear from any Class Member who attends the Final Approval Hearing and asks to speak; and
- 7) If you or your lawyer has objected to any class action settlement where you or your lawyer asked for or received any payment in exchange for dismissal of the objection, or any related appeal, without any modification to the settlement, then your objection must include a statement identifying each such case by full case caption and amount of payment received.

Your written objection must be mailed to the Administrator no later than **October 6, 2026**.

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

You may appear at the Final Approval Hearing and orally object without first submitting a written objection or notice of appearance.

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will not receive a payment from the Settlement, 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.StockpileDataSettlement.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.StockpileDataSettlement.com. If you have additional questions, you can visit the Settlement Website, contact the Administrator or contact Class Counsel.

Resource	Contact Information
Case website	www.StockpileDataSettlement.com
Settlement Administrator	Stockpile Data Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 1-844-747-4126 info@StockpileDataSettlement.com
Your Lawyers	Jeffrey A. Koncius Kiesel Law LLP 8648 Wilshire Blvd. Beverly Hills, California 90211 Dean J. Zipser Mark A. Finkelstein Umberg Zipser LLP 1920 Main Street, Suite 750 Irvine, California 92614