

[Settlement Class Member's Unique ID]

[Settlement Class Member's PIN]

## NOTICE OF PROPOSED CLASS SETTLEMENT

### COURT OF COMMON PLEAS LACKAWANNA COUNTY, PENNSYLVANIA

*You have received this Notice because your Personal Information was exposed during a Cybersecurity Incident at Lehigh Valley Health Network, Inc. announced on or about February 22, 2023.*

*This is not a lawyer solicitation.*

A \$65 million settlement (“Settlement Fund”) has been reached in a class action lawsuit brought in 2023 by Plaintiff Jane Doe (“Class Representative”) against Lehigh Valley Health Network, Inc. (“LVHN” or “Defendant”) in the Court of Common Pleas of Lackawanna County, Pennsylvania (the “Court”). The lawsuit alleges that Defendant failed to adequately protect patient data it received from patients and healthcare providers whose Personal Information was exposed during a data breach announced by Defendant on or about February 22, 2023. A Data Breach Notice was sent to each of the individuals who comprise the Settlement Class. A portion of certain Settlement Class Members’ Personal Information was published on the dark web by the perpetrator of the data breach, an entity known as BlackCat. Defendant denies any wrongdoing and further denies that the Settlement Class has a viable legal claim. You have been identified as a potential member of the Settlement Class. Each Settlement Class Member has been placed into one or more of four Relief Tiers as described in the Settlement Agreement. An independent Special Master allocated the Settlement Fund among the four Relief Tiers. The amount of the Settlement Fund allocated to each Relief Tier will be paid on a pro-rata basis to Settlement Class Members up to a specific amount in the particular Relief Tier.

This Notice provides your unique identifier to allow you to confidentially view the Relief Tier(s) in which you are placed and your estimated gross settlement payout. A Settlement Class Member can also submit a Claim Form for Out-of-Pocket Losses. All payments to Settlement Class Members, other than those for Out-of-Pocket Losses based on a Claim Form, shall be sent automatically after the Effective Date. The Settlement must be approved by the Court before any payment is issued from the Settlement Fund to any Settlement Class Member.

[Settlement Class Member's Unique ID]

**To Opt-Out:** If you do not wish to participate in the proposed Settlement, you must exclude yourself on or before the Opt-Out Deadline October 21, 2024. Please visit [www.LVHNDataBreachSettlement.com](http://www.LVHNDataBreachSettlement.com) for more information.

**To Object:** If you wish to object to the proposed Settlement, you must take specific steps on or before the Objection Deadline October 21, 2024. Please visit [www.LVHNDataBreachSettlement.com](http://www.LVHNDataBreachSettlement.com) for more information.

The Court will hold a Final Approval Hearing on November 15, 2024, to consider whether to approve the proposed Settlement as well as Class Counsel’s Application for a Fee and Expense Award in an amount not to exceed one-third of the \$65 million Settlement Amount, plus litigation expenses for their work in the case, which will be paid from the Settlement Amount. The Court will also consider a Service Award payment of up to \$125,000.00 for the Class Representative. You can appear at the hearing, but you do not have to. If you want to, you can hire your own attorney, at your own expense, to appear or speak for you at the hearing. If the Court approves the proposed Settlement, you will not be able to sue for similar claims if you remain in the class.

***For more information, visit [www.LVHNDataBreachSettlement.com](http://www.LVHNDataBreachSettlement.com) or  
call toll-free 1-877-399-3230***

***Para una notificación en Español, visitar [www.LVHNDataBreachSettlement.com](http://www.LVHNDataBreachSettlement.com)***