

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Campbell et al. v. Mental Health Association, Inc.
Case No. 2579CV00419
Superior Court of Hampden County, Massachusetts

**YOU HAVE BEEN IDENTIFIED AS A SETTLEMENT CLASS MEMBER.
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

A Court has authorized this notice. This is not a solicitation from a lawyer.

You are not being sued.

Please read this Notice carefully and completely.

- A Settlement has been reached with Mental Health Association, Inc. (“MHA” or “Defendant”) in a class action lawsuit. This case concerns Plaintiffs’ allegations regarding the cyberattack on MHA’s computer systems that occurred in November 2024 (the “Data Incident”). Certain files that contained private information were accessible. These files may have contained personal information such as Name; Address; Social Security Number; Medical Diagnosis/Condition; Medication; Medical Record Number; other Medical Information; Date of Birth; and/or Driver’s License Number.
- The lawsuit is called *Campbell et al. v. Mental Health Association, Inc.*, Case No. 2579CV00419. It is pending in the Superior Court of Hampden County, Massachusetts (the “Litigation”).
- MHA denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- **You Have Been Identified.** MHA’s records indicate that you are a Class Member and entitled to benefits under the Settlement. You may have received a previous notice directly from MHA.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.MHADDataSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	November 19, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	You may object to the Settlement in writing, but you are not required to do so. You may also appear at the Final Approval Hearing and object without submitting written notice in advance. If you object, you may also file a claim for Settlement benefits.	November 19, 2026
DO NOTHING	You are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement.	No Deadline

- 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.

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Basic Information

1. Why was this Notice issued?

The Superior Court of Hampden County, Massachusetts, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Campbell et al. v. Mental Health Association, Inc.*, Case No. 2579CV00419. It is pending in the Superior Court of Hampden County, Massachusetts. The people who filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Mental Health Association, Inc., is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the November 2024 cyberattack on MHA's computer systems, certain files that contained private information were accessible. These files may have contained personal information such as Name; Address; Social Security Number; Medical Diagnosis/Condition; Medication; Medical Record Number; other Medical Information; Date of Birth; and/or Driver's License Number.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people who they allege have similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, after a court grants certification, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members. In this Settlement, the Class Representatives are Chefon Campbell and Chyanne Grant. Everyone included in the Settlement Class is a Settlement Class Member.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Court has defined the Class this way: “All persons whose Private Information was accessible because of the Data Incident which occurred on or around November 28, 2024.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s family and staff; (2) MHA and its officers and directors; and (3) anyone who perpetrated the Data Incident.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@MHADataSettlement.com
- Call toll free, 24/7: 1-844-496-0629
- By mail: MHA Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at www.MHADataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

MHA has agreed to pay or cause to be paid a number of different benefits. All Settlement Class Members may claim one or more of the **cash payment** options and/or **FREE Credit Monitoring Services** provided through CyEx Identity Defense Complete. The benefits are explained in more detail below.

CASH PAYMENT OPTIONS. The available cash payment options include an alternate cash payment, or documented out-of-pocket losses and lost time. These options are subject to the documentation requirements, deadlines, and applicable pro rata cap described below.

CREDIT MONITORING SERVICES. All Class Members are eligible to enroll in three years of free credit monitoring service through CyEx Identity Defense Complete. This comprehensive service comes with \$1 million in identity theft insurance, and includes:

- real time monitoring of your credit file
- dark web scanning
- comprehensive public records monitoring

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

This benefit is free to all Settlement Class Members. There is no cost for this benefit for the entire three year term offered.

CASH PAYMENT DETAILS

Alternate Cash Payment. *Instead of any other cash payment option, you may claim a one-time \$40.00 cash payment. You do not have to provide any proof or explanation to claim this payment.*

Documented Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$5,000.00**. The losses must have occurred between November 28, 2024, and November 19, 2026.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs
- postage to contact banks by mail

You need to send proof, like bank statements or receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

Lost Time. Class Members who spent time responding to the Data Incident may claim up to three hours, at \$25.00 per hour, for a maximum of **\$75.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- changing your passwords
- investigating suspicious activity in your accounts
- researching the Data Incident

You must briefly describe how you spent this time.

There is a cap of \$300,000.00 on these benefits. This means that if the total value of benefits claimed is over \$300,000.00, all alternate cash payments will be reduced *pro rata* so that the total value of benefits do not exceed \$300,000.00.

A full description of how this works is available in the Settlement Agreement, at www.MHADataSettlement.com.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@MHADataSettlement.com
- Call toll free, 24/7: 1-844-496-0629
- By mail: MHA Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799-9958

Submitting a Claim Form for a Settlement Payment

8. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.MHADataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

MHA Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-844-496-0629, by email info@MHADataSettlement.com, or by U.S. mail at the address above.

9. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by November 19, 2026. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than November 19, 2026.

10. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on December 15, 2026 (**see Question 18**). If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

The Lawyers Representing You

11. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Casondra R. Turner of Milberg, PLLC and Leanna A. Loginov of Shamis & Gentile, P.A., to represent you and other Class Members ("Class Counsel"). Their contact information is below:

Casondra Turner
MILBERG, PLLC
260 Peachtree Street NW, Suite 2200
Atlanta, GA 30303
Telephone: (866) 252-0878
cturner@milberg.com

Leanna Loginov
SHAMIS & GENTILE, P.A.
14 NE 1st Ave., Suite 705
Miami, FL 33132
Telephone: (305) 479-2299
lloginov@shamisgentile.com

12. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

13. How will Class Counsel be paid?

Class Counsel will ask the Court to approve up to and not more than \$250,000.00 as reasonable attorneys' fees and costs of litigation. The amount awarded by the Court will be paid by or on behalf of MHA. In order to receive any attorneys' fees or reimbursement of case expenses, Class Counsel must file a motion requesting fees and expenses, and must satisfy the legal standard for a fee and expense award. Any award of attorneys' fees and expenses is subject to Court approval.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments awarded by the Court will also be paid by or on behalf of MHA.

Commenting on or Objecting to the Settlement

14. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You may object in writing, but you are not required to do so. For a written objection, you must provide the following information for the Court to consider your objection:

- (1) your full name, mailing address, telephone number, and email address;
- (2) the name of the Litigation: *Campbell et al. v. Mental Health Association, Inc.*, Case No. 2579CV00419, pending in the Superior Court of Hampden County, Massachusetts;
- (3) information that proves that you are a Class Member (such as a notice you have received);
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your written objection to be valid, it must meet each of these requirements.

You may also appear at the Final Approval Hearing and tell the Court your objection without submitting written notice in advance. The date, time, and location of the Final Approval Hearing is listed in Section 15 below.

Written objections must be filed with the Clerk of Court by **November 19, 2026**. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court Hampden County Superior Court 50 State St. Springfield, MA 01103	MHA Data Incident Settlement c/o Settlement Administrator PO Box 25191 Santa Ana, CA 92799-9958

The Court's Final Approval Hearing

15. When is the Court's Final Approval Hearing?

The Court will hold a Final Approval Hearing on **December 15, 2026** in the Superior Court of Hampden County, Massachusetts, at 50 State St., Springfield, MA 01103

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide how Class Counsel should be paid, and whether to award Service Award payments to the Class Representatives. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may appear at the Final Approval Hearing and ask the Court's permission to speak at the hearing about your objection, even if you did not submit a written objection in advance (**See Question 14**).

There is no cost for you and your lawyer to attend the hearing. However, you will not be reimbursed for any personal costs that you incur traveling to or attending the hearing. Attendance at the Final Approval Hearing is at your own expense. You will also not be reimbursed for hiring a separate lawyer to come with you to, or representing you at, the Final Approval Hearing. Hiring your own lawyer is at your own expense.

The date and time of this hearing may change without further notice. Please check www.MHADataSettlement.com for updates.

16. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file a written objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also attend and object at the Final Approval Hearing even if you do not submit a written objection. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

17. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in the Settlement Agreement.

Getting More Information

18. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.MHADataSettlement.com.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@MHADataSettlement.com
- Call toll free, 24/7: 1-844-496-0629
- By mail: MHA Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Hampden County Superior Court at 50 State St. Springfield, MA 01103.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT