NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Anderson v. Bauer Built Inc. d/b/a Bauer Built Tire & Service
Case No. 2026CH05015
Circuit Court of Cook County, Illinois, Chancery Division

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE APRIL 2023 BAUER SECURITY INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS AND 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 Bauer Built Inc. d/b/a Bauer Built Tire & Service ("Bauer" or "Defendant") in a class action lawsuit. This class action lawsuit concerned the targeted cyberattack on Bauer's computer systems that occurred between April 16, 2023, and April 21, 2023 (the "Security Incident"). Certain files that contained private information were accessed. These files may have contained personal information such as full names; Social Security numbers; government identification numbers; driver's license numbers; state identification numbers; or financial account numbers.
- The lawsuit is called *Anderson v. Bauer Built Inc. d/b/a Bauer Built Tire & Service*, Case No. 2026CH05015, pending in the Circuit Court of Cook County, Illinois, Chancery Division (the "Action").
- Bauer 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.
- Bauer's records indicate that you are a Class Member and are entitled to benefits under the Settlement. You may have received a previous notice directly from Bauer.
- 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 from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at https://BauerSecurityIncident.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.	**December 31, 2026**
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	**December 1, 2026**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	**December 1, 2026**
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by 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 Judge overseeing this Action 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 *Anderson v. Bauer Built Inc. d/b/a Bauer Built Tire & Service*, Case No. 2026CH05015. The Judge in the Circuit Court of Cook County, Illinois, Chancery Division is in charge of the case. The person that filed this lawsuit is called the "Plaintiff" (or "Class Representative"), and the entity he sued, Bauer Built Inc. d/b/a Bauer Built Tire & Service, is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during the April 2023 targeted cyberattack on Bauer's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as full names; Social Security numbers; government identification numbers; driver's license numbers; state identification numbers; or financial account numbers.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the "Plaintiffs" or "Class Representatives." Together, the people included in the class action are called a "Class" or "Class Members." One court resolves the lawsuit for all Class Members, except for those who opt out of the Settlement. In this Settlement, the Class Representative is Jordan Anderson, and everyone included in the Action is a Class Member.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant is 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. Plaintiff and Class Counsel believe the Settlement is in the best interests of all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: "*All individuals residing in the United States who were sent notice by or on behalf of Defendant Bauer Built Inc. that their Personal Information was potentially affected by the April 2023 data security incident discovered by Bauer Built. Settlement Class membership is determined solely by Defendant's records identifying the individuals to whom notice of the data breach was sent.*"

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) Bauer's officers and directors, (3) anyone who validly excludes themselves from the Settlement, and (4) anyone involved in perpetrating the Security 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@BauerSecurityIncident.com
- Call toll free, 24/7: (888) 226-9511
- By mail: Bauer Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You may also view the Settlement Agreement at https://BauerSecurityIncident.com.

The Settlement Benefits

7. What does the Settlement provide?

Bauer has agreed to provide a range of benefits to the Class. Class Members can claim Credit Monitoring Services and one of the options below:

Option 1: One or more of the following:

- Out-of-Pocket Expenses
- Losses from Fraud or Identity Theft
- Compensation for Lost Time

OR

Option 2: Alternative Cash Payment.

Instead of any of the benefits in Option 1, you can choose to get a one-time $45.00 payment.

These benefits are explained on the next page.

Credit Monitoring Services. You can enroll in two years of credit monitoring from the three credit bureaus. This benefit comes with $1,000,000.00 in identity theft protection. An enrollment code will be emailed to you.

And 1 of the Options Below.

OPTION 1

You can claim one or more of the following:

Out-of-Pocket Expenses. You can get back up to $500.00 for out-of-pocket expenses. These expenses have to be because of the Security Incident. You will need to provide proof, like receipts, to show your expenses. You can include your own notes to explain or clarify the receipts, but your notes by themselves are not enough for a valid claim. Examples of covered expenses are fees for credit reports or credit monitoring, or the cost of replacing your IDs.

Losses from Fraud or Identity Theft. You can be reimbursed up to $5,000.00 if you lost money because of fraud or identity theft. For a valid claim you must:

(1) provide proof, like bank statements, that shows you lost the money and didn't get it back;
(2) explain that the loss was likely because of the Security Incident; and
(3) show that you tried your best to avoid the loss or to get your money back.

The losses are covered only if they happened after April 16, 2023. If the loss is a smaller expense, like a charge or a fee, it should be claimed under Out-of-Pocket Expenses, above.

You will need to provide proof, like bank statements, to show your losses. You can include your own notes to explain or clarify the proof, but your notes by themselves are not enough for a valid claim.

Compensation for Lost Time. If you spent time dealing with problems from the Security Incident, you can get paid for your time. You can claim up to 4 hours of time, at $25.00 per hour. The maximum lost time payment is $100.00. This payment counts toward the $500.00 cap under Out-of-Pocket Expenses, above.

You do not need to submit proof, but you will need to provide a short description of what you did during that time.

OPTION 2

Alternative Cash Payment. Instead of any of the benefits in Option 1, you can choose to get a one-time $45.00 payment. You do not need to provide any proof or supporting documentation to claim this payment.

Do not claim this payment if you are claiming any of the benefits under Option 1. You may, however, claim Credit Monitoring Services together with the Alternative Cash Payment.

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

- Email: info@BauerSecurityIncident.com
- Call toll free, 24/7: (888) 226-9511
- By mail: Bauer Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

8. What claims am I releasing if I stay in the Class?

If you stay in the Class, you won't be able to be part of any other lawsuit against Bauer about the issues that this Settlement covers. The "Release" section of the Settlement Agreement (paragraphs 65–67) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at https://BauerSecurityIncident.com.

Submitting a Claim Form for a Settlement Payment

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

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

Bauer Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (888) 226-9511, by email info@BauerSecurityIncident.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by December 31, 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 December 31, 2026.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on January 27, 2027. (***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

12. Do I have a lawyer in the case?

Yes, the Court appointed Cassandra P. Miller of Strauss Borrelli PLLC, to represent you and other Class Members ("Class Counsel").

13. 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.

14. How will Class Counsel be paid?

Class Counsel will ask the Court to approve $125,000.00, which will be paid by Bauer.

Class Counsel will also ask for a Service Award of $2,500.00 for the Class Representative. The Service Award will also be paid by Bauer.

Excluding Yourself from the Settlement

15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called "opting out." If you opt out, you will not receive any benefits from the Settlement, but you will keep any rights you may have to sue Bauer on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **December 1, 2026**.

To be valid, your Request for Exclusion must have the following information:

(1) the name of the Action: *Anderson v. Bauer Built Inc. d/b/a Bauer Built Tire & Service*, Case No. 2026CH05015, pending in the Circuit Court of Cook County, Illinois, Chancery Division;

(2) your full name and current mailing address;

(3) your personal signature; and

(4) the words "Request for Exclusion" or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Bauer Security Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **December 1, 2026**.

Commenting on or Objecting to the Settlement

16. 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 cannot object if you have excluded yourself from the Settlement (***see* Question 15**).
You must provide the following information for the Court to consider your objection:

(1) the name of the Action: *Anderson v. Bauer Built Inc. d/b/a Bauer Built Tire & Service*, Case No. 2026CH05015, pending in the Circuit Court of Cook County, Illinois, Chancery Division;

(2) your full name and current mailing address;

(3) a clear description of all the reasons you object; include any legal support you may have for your objection;

(4) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and telephone number;

(5) whether or not you or your lawyer would like to speak at the Final Approval Hearing;

(6) a list of any cases from the last 3 years in which you or your lawyer objected;

(7) your signature (or, if you have hired your own lawyer, your lawyer's signature).

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

To be considered by the Court, you must file your complete objection with the Clerk of Court by **December 1, 2026**. You must also send a copy of your objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court 50 W. Washington St. Chicago, IL 60602	Bauer Security Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

The Court's Final Approval Hearing

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

The Court will hold a Final Approval Hearing on **January 27, 2027, at 11:00 a.m. Central Time**, via Zoom (Meeting ID: 946 7646 3310; Password: 145041), before the Honorable Lynn Weaver-Boyle, Circuit Court of Cook County, Illinois, Courtroom 2502.

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 a Service Award to the Class Representative who brought this Action on behalf of the Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (***See* Question 16**).

The date and time of this hearing may change without further notice. Please check https://BauerSecurityIncident.com for updates.

19. 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 an 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 pay your own lawyer to attend, but you do not have to.

If I Do Nothing

20. 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 **Question 8**.

Getting More Information

21. 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, https://BauerSecurityIncident.com.

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

- Email: info@BauerSecurityIncident.com
- Call toll free, 24/7: (888) 226-9511
- By mail: Bauer Security Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 50 W. Washington St., Chicago, IL 60602

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