NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Aguilar v. International Coffee &Tea, LLC
Case No. 25STCV00002
Superior Court for Los Angeles County, California

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE INTERNATIONAL COFFEE & TEA, LLC D/B/A THE COFFEE BEAN & TEA LEAF DATA SECURITY INCIDENT OCCURING BETWEEN APRIL 2024 AND AUGUST 2024, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS

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.
Para obtener una copia de este documento en español, por favor comuníquese con info@InternationalCoffeeSettlement.com o 1-(833) 296-0718

- A Settlement has been reached with International Coffee & Tea, LLC d/b/a The Coffee Bean & Tea Leaf ("International Coffee" or "Defendant") in a class action lawsuit. This case is about the targeted unauthorized access of International Coffee's computer systems occurring on a limited number of occasions between April 2024 to August 2024 ("Data Security Incident"). Certain files that contained Private Information may have been accessed and may have contained personal information such as names; Social Security numbers; dates of birth; driver's license numbers; financial account information; medical information; health insurance information; Passport numbers; taxpayer identification numbers; usernames and passwords; payment card information; and digital/electronic signatures.
- The lawsuit is called *Aguilar v. International Coffee &Tea, LLC*, Case No. 25STCV00002. It is pending in the Superior Court for Los Angeles County, California ("Litigation").
- The claims in the Litigation are disputed and International Coffee denies that it did anything wrong and denies liability. The Court has not made any determination as to whether or not International Coffee is at fault.
- The parties have agreed to settle the lawsuit ("Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.

- International Coffee's records indicate that you are a Settlement Class Member and entitled to benefits under the Settlement. You may have received a previous notice directly from International Coffee.
- 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 cash 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.InternationalCoffeeSettlement.com**. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.	**February 10, 2027**
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment or Credit Monitoring. 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.	**January 11, 2027**
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 Class Member benefits.	**January 11, 2027**
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive any payments from this Settlement and will only receive an activation code for one year of CyEx Financial Shield Complete (detailed below). 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 and released 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 Superior Court for Los Angeles County, California, 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 *Aguilar v. International Coffee &Tea, LLC*, Case No. 25STCV00002. It is pending in the Superior Court for Los Angeles County, California. The people that filed this lawsuit are called the "Plaintiffs" ("Class Representatives") and the company they sued, International Coffee & Tea, LLC d/b/a The Coffee Bean & Tea Leaf, is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that between April and August 2024, there was a targeted cyberattack on International Coffee's computer systems, and that certain files that contained Private Information may have been accessed. These files may have contained personal information such as names; Social Security numbers; dates of birth; driver's license numbers; financial account information; medical information; health insurance information; Passport numbers; taxpayer identification numbers; usernames and passwords; payment card information; and digital/electronic signatures.

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 proposed Settlement, the Class Representatives are Jazmin Aguilar; Israel Roca Pina; and Elizabeth Cervantes. Everyone included in this Action are the Settlement Class Members.

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 Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Court has defined the Settlement Class this way: "All approximately 53,901 individuals residing in the United States who were allegedly potentially impacted by the Data Security Incident ."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge(s) presiding over the Action and members of their immediate families and their staff; (2) International Coffee and its subsidiaries, parent companies, successors, predecessors, and any entity in which International Coffee, has a controlling interest; (3) natural persons who properly execute and submit a request to opt out prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

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

- Email: info@InternationalCoffeeSettlement.com
- Call toll free, 24/7: 1-(833) 296-0718
- By mail: International Coffee Data Security Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at **www.InternationalCoffeeSettlement.com**.

The Settlement Benefits

7. What does the Settlement provide?

International Coffee will establish a Settlement Fund of $900,000.00 and implement or continue the implementation of enhancements to data security with a preliminary cost of $420,000 and which will be paid for by International Coffee separate and apart from the Settlement Fund. The Settlement Fund will first be used to pay court-approved attorneys' fees (totaling $439,956) and litigation costs (totaling $16,788.24), Service Award payments for the Plaintiffs ($2,500 each, totaling $7,500), and the costs of administering the Settlement and providing one year of CyEx Financial Shield Complete (totalling $75,000). The net remaining money will be used to pay for the benefits described below, apart from the Business Practice Enhancements valued at $420,000, which will be paid by International Coffee separate and apart from the Settlement Fund.

All Settlement Class Members may enroll in **Credit Monitoring Services** and claim one or more **cash payment** option. The benefits are explained in more detail below.

CREDIT MONITORING SERVICES. All Settlement Class Members are eligible to enroll in one year of CyEx Financial Shield Complete. Enrollment codes have been sent to all Settlement Class Members by postcard. If you no longer have your enrollment code, please contact the Administrator.

This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

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

CASH PAYMENTS. Settlement Class Members who have documented losses may claim a **Documented Loss Payment**. Alternatively, Settlement Class Members may claim a one-time payment from **Alternative Cash Payment**. Settlement Class Members who are or were California residents at any point between April 5, 2024 and February 10, 2027 may also claim an additional payment from **California Resident Cash Payment, which will be calculated as three times the Alternative Cash Payment**. You may claim either a Documented Loss Payment or an Alternative Cash Payment; plus a California Resident Cash Payment, if you are or were a California resident at any point between April 5, 2024 and the deadline to submit a claim is February 10, 2027.

Documented Loss Payment. If you incurred actual, documented out-of-pocket losses due to the Data Security Incident, you can get back up to **$5,000.00**. The losses must have occurred between April 5, 2024, and **February 10, 2027.**

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 receipts, to show how much you spent or lost. Your personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but you may include that to provide clarification, context, or support for other submitted reasonable documentation showing that your expenses were because of the Data Security Incident.

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

Alternative Cash Payment. Instead of *Documented Loss Payment*, you may claim a one-time cash payment. This payment is expected to be **$25.00**, but may be larger or smaller depending on the total claims filed. You do not have to provide any proof or explanation to claim this payment.

California Resident Cash Payment. In addition to either a *Documented Loss Payment* or an *Alternative Cash Payment*, Settlement Class Members who are or were residents of California at any point between April 5, 2024 and February 10, 2027, may claim a one-time cash payment of **$75.00**. The payment amount may be adjusted downward on a *pro rata* basis depending on the total number of claims filed.

Settlement Class Members will have to provide proof of California residency during the claims period. A sworn attestation shall satisfy the proof requirement for California residency.

Business Practice Enhancements. All Settlement Class Members will receive the benefit of the $420,000 in enhanced data security measures that have been or will be implemented by International Coffee as a result of the Settlement. This prospective relief will benefit all Class Members, regardless of whether they make a claim, and is intended for the continued protection of the Private Information that remains in International Coffee's possession going forward. The costs of these measures will be borne by International Coffee separate and apart from the Settlement Fund.

Residual Funds. While the Settlement Fund is designed to be exhausted and paid out *pro rata* to all Settlement Class Members who submit a claim, in the event it becomes economically infeasible to redistribute residual funds, such funds will be distributed to the Electronic Frontier Foundation, a 501(c)(3) non-profit that promotes non-partisan digital privacy efforts.

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

- Email: info@InternationalCoffeeSettlement.com
- Call toll free, 24/7: 1-(833) 296-0718
- By mail: International Coffee Data 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 Settlement Class?

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against International Coffee about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section 4) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at **www.InternationalCoffeeSettlement.com**.

The Released Claims means any and all claims or causes of action of every kind and description, which accrued during the Release Period, including any causes of action in law, claims in equity, complaints, suits or petitions, and any allegations of wrongdoing, demands for legal, equitable or administrative relief (including, but not limited to, any claims for injunction, rescission, reformation, restitution, disgorgement, constructive trust, declaratory relief, compensatory damages, consequential damages, penalties, exemplary damages, punitive damages, attorneys' fees, costs, interest or expenses)--whether known or unknown- arising from or related to the Data Security Incident in any way.

The Release Period means the period of time from April 5, 2024, until the date the Court granted preliminary approval of the Settlement, September 1, 2026.

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 **www.InternationalCoffeeSettlement.com**. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

International Coffee Data 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, at 1-(833) 296-0718, by email info@InternationalCoffeeSettlement.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 **February 10, 2027**. If you are submitting a Claim Form by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **February 10, 2027.**

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on **April 15, 2027, at 10:30am** (***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.

Please be patient.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys John J. Nelson of Milberg, PLLC; A. Brooke Murphy of the Murphy Law Firm; and Kristen Lake Cardoso of Kopelowitz Ostrow P.A., to represent you and other Settlement Class Members ("Class Counsel").

13. Should I get my own lawyer?

You will not be charged for Class Counsels' 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 up to one-third, or $439,956, of the Settlement Consideration (i.e., the $900,000 Settlement Fund and the $420,000 in Business Practice Enhancements) as reasonable attorneys' fees, plus reimbursement of litigation costs. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for Service Award payments of $2,500.00 for each of the Class Representatives. Service Award payments will also be paid from the Settlement Fund.

Class Counsel will also seek reimbursement of litigation expenses in the amount of $16,788.24 and Settlement Administration costs and the costs of providing the CyEx Financial Shield Complete of no more than $75,000.

Opting-Out 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 an Opt-Out Request.

If you opt-out, 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 opt-out. However, you will keep any rights you may have to sue International Coffee on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **January 11, 2027.**

To be valid, your Opt-Out Request must have the following information:

(1) the name of the Litigation: *Aguillar v. International Coffee &Tea, LLC*, Case No. 25STCV00002, pending in the Superior Court for Los Angeles County, California;

(2) your full name, mailing address, telephone number, and email address;

(3) personal signature; and

(4) the words "Opt-Out Request" 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:

International Coffee Data Security Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Opt-Out Request must be submitted and postmarked by **January 11, 2027.**

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

You cannot object if you have opted-out from the Settlement (***see* Question 15**)

You must provide the following information for the Court to consider your objection:

(1) the name of the Litigation: *Aguillar v. International Coffee &Tea, LLC*, Case No. 25STCV00002, pending in the Superior Court for Los Angeles County, California;

(2) your full name, current mailing address, telephone number, and email address (if any);

(3) include proof that the Class Member is a member of the Settlement Class (e.g., copy of the Settlement Notice, copy of the original notice of the Data Security Incident);

(4) identify the specific factual and legal grounds for the objection;

(5) identify all counsel representing the Class Member, if any;

(6) contain a statement regarding whether the Class Member (or counsel of his or her choosing) intends to appear at the Final Approval Hearing.

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

To be considered by the Court, you must send a copy of the objection by U.S. Mail to the Settlement Administrator by **January 11, 2027**. You may also personally appear at the final approval hearing and orally object, subject to Court approval.

Settlement Administrator
International Coffee Data Security Incident Settlement ATTN: Objections 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 opt-out from the Settlement. Opting out from the Settlement is 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 on **April 15, 2027, at 10:30am Pacific Time**, in Department 12 of the Superior Court for Los Angeles County, California, at the Stanley Mosk Courthouse, 111 N. Hill Street, Los Angeles, CA 90012.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award to the Class Representatives. The Court will also consider any timely objections to the Settlement.

If you are a Settlement 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

www.InternationalCoffeeSettlement.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, the only benefit you will receive from this Settlement is the benefit of Defendant's additional data security enhancements and the enrollment code for one year of CyEx Financial Shield Complete.

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, **www.InternationalCoffeeSettlement.com.**

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

- Email: info@InternationalCoffeeSettlement.com
- Call toll free, 24/7: 1-(833) 296-0718
- By mail: International Coffee Data 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, 111 N. Hill Street, Los Angeles, CA 90012.

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