Superior Court for Suffolk County, Massachusetts

Peter Samiotes, et al. v. DotHouse Health, Inc.
Docket No. 2584CV01999

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE NOVEMBER 2022 DOTHOUSE HEALTH, INC., DATA INCIDENT, 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 DotHouse Health, Inc. ("DHI" or "Defendant") in a class action lawsuit. This case is about a cybersecurity incident that impacted certain DHI systems in November 2022 (the "Data Incident"). During the Data Incident an unauthorized third party accessed certain files that included private information of certain DHI patients. These files may have contained personal information such as names, addresses, dates of birth, medical record numbers, Social Security numbers, treatment information, and health insurance information.
- The lawsuit is called *Peter Samiotes, et al. v. DotHouse Health, Inc.*, Docket No. 2585CV01999. It is pending in the Superior Court for Suffolk County, Massachusetts (the "Litigation").
- DHI 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.
- DHI'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 DHI.
- 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 atwww.DotHouseDataSettlement.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.	**January 29, 2027**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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 29, 2026**
DO NOTHING	You are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments 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 Superior Court for Suffolk 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 *Peter Samiotes, et al. v. DotHouse Health, Inc.*, Docket No. 2585CV01999. It is pending in the Superior Court for Suffolk County, Massachusetts. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, DotHouse Health, Inc., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during the November 2022 cybersecurity incident that impacted certain DHI systems. During the Data Incident an unauthorized third party accessed certain files that included private information of certain DHI patients. These files may have contained personal information such as names, addresses, dates of birth, medical record numbers, Social Security numbers, treatment information, and health insurance information.

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 named "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. In this Settlement, the Class Representatives are Peter Samiotes, Derek Holman, Ralph Davis, Frances Keough, Evbakhavbokun Von Idumwonyi, and Tiara Thompson. Everyone included in this Action are the 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 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: "(i) former or current Massachusetts residents who were part of the Notice Class or (ii) individuals who were not and are not Massachusetts residents but are part of the Notice Class and choose to participate in the settlement"

The Notice Class is defined as the approximately 145,000 individuals who were sent notice of the Data Incident by Defendant in or around July 2025 and for whom notice was not returned as undeliverable."

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are all persons who are: (a) directors and officers of Defendant; and (b) the Judge(s) assigned to the Action, and any of their immediate family members and Court staff. The Settlement Class consists of approximately 145,000 individuals.

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@DotHouseDataSettlement.com
- Call toll free, 24/7: (833) 296-0911
- By mail: DotHouse Data Incident Settlement
  c/o Settlement Administrator
  PO Box 25191
  Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

DHI will establish a Settlement Fund of $750,000.00. The Settlement Fund will first be used to pay court-approved attorneys' fees and costs, Service Award payments for the named Plaintiffs, and the costs of administering the Settlement. The net remaining money will be used to pay for the benefits described below.

CREDIT MONITORING. All Class Members are eligible to claim two years of CyEx Medical Shield Complete. This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- Medical fraud or medical identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions
- one-bureau credit monitoring

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

CASH PAYMENT OPTIONS

Cash Payment for Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **$2,000.00**. The losses must have occurred between October 31, 2022, and January 29, 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 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.

***Pro Rata* Cash Payment.** Instead of the benefits in *Cash Payment for Documented Losses*, you may claim a one-time *pro rata* cash payment currently estimated to be $40.

It is expected that a significant amount of money will remain in the Settlement Fund after all expenses and all other benefits have been paid. All of this remaining money will be divided equally between everyone who claims a *Pro Rata* Cash Payment.

You do not have to provide any proof or explanation to claim this payment.

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

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- By mail: DotHouse Data Incident Settlement
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  Santa Ana, CA 92799-9958

8. What claims am I releasing ?

If this Settlement is finally approved, you won't be able to be part of any other lawsuit against DHI about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section XIII) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.DotHouseDataSettlement.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 www.DotHouseDataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

DotHouse 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, (833) 296-0911, by email info@DotHouseDataSettlement.com, or by U.S. mail at the address above.

For the pro rata cash payment and the credit monitoring, you may use the summary "tear-off" Claim Form attached to the Postcard Notice you received.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by January 29, 2027. 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 January 29, 2027.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on January 19, 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 has appointed attorneys David K. Lietz of Milberg, PLLC, and Raina Borrelli 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 up to $250,000.00 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.

Commenting on or Objecting to the Settlement

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

(1) the name of the Litigation: *Peter Samiotes, et al. v. DotHouse Health, Inc*., Docket No. 2585CV01999, pending in the Superior Court for Suffolk County, Massachusetts;

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

(3) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;

(4) the number of times the objector has objected to a class action settlement within the 5 years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;

(5) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;

(6) the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;

(7) whether the objector and/or objector's counsel will appear at the Final Approval Hearing, and;

(8) your signature (if you have hired your own lawyer, their signature is not sufficient).

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 29, 2026. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of the Court	Settlement Administrator
Clerk of the Court 3 Pemberton Square, 12th Floor, Boston, MA 02108	DotHouse Data Incident Settlement c/o Settlement Administrator PO Box 25191 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendants
David Lietz **MILBERG, PLLC** 5335 Wisconsin Ave., NW, Suite 440 Washington, DC 20015	Christopher Iaquinto **HOLLAND & KNIGHT LLP** 10 St. James Ave., 11th Floor Boston, MA 02116

The Court's Final Approval Hearing

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

The Court will hold a final approval on **January 19, 2027**, in Room 313 of the Superior Court for Suffolk County, Massachusetts, at 3 Pemberton Square, 12th Floor, Boston, MA 02108.

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 ask permission to speak at the hearing at your own cost (***See* Question 15**).

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

17. 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

18. 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

19. 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.DotHouseDataSettlement.com.

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

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- Call toll free, 24/7: (833) 296-0911
- By mail: DotHouse 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, 3 Pemberton Square, 12th Floor, Boston, MA 02108.

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