District Court for Kootenai County, Idaho

In re Lakeside Pediatric Data Breach Litigation
Case No. CV-28-26-1876

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOU WERE SENT NOTICE THAT YOUR PRIVATE INFORMATION WAS POTENTIALLY INVOLVED IN THE OCTOBER 2024 LAKESIDE PEDIATRIC & ADOLESCENT MEDICINE, P.L.L.C., DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO SETTLEMENT 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.

- A Settlement has been reached with Lakeside Pediatric & Adolescent Medicine, P.L.L.C. ("Lakeside Pediatric" or "Defendant") in a class action lawsuit. This case involves the October 2024 cyberattack in which a criminal third-party gained unauthorized access to Lakeside Pediatric's network (the "Data Incident"). Certain files that contained private information were potentially accessed. These files may have contained personal information such as: names, dates of birth, driver's license and/or state identification numbers, medical record numbers, diagnosis/conditions information, lab results, medications information, health care claims information, clinical/treatment information, and, for a limited number of individuals, Social Security numbers.
- The lawsuit is called *In re Lakeside Pediatric Data Breach Litigation*, Case No. CV-28-26-1876. It is pending in the District Court for Kootenai County, Idaho (the "Litigation").
- Lakeside Pediatric denies all claims and allegations of wrongdoing and denies all liability, 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 as a Settlement Class Member, and you may be entitled to Settlement Class Member Benefits.
- 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.LakesideSettlement.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.	**Submitted online or postmarked by** **January 28, 2027**
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no Settlement Class Member Benefits. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the Released Claims resolved by this Settlement. You can hire your own lawyer at your own expense.	**December 29, 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 Class Member Benefits.	**December 29, 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 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 or the Released Claims related to the Released 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 District Court for Kootenai County, Idaho, 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 *In re Lakeside Pediatric Data Breach Litigation*, Case No. CV-28-26-1876. It is pending in the District Court for Kootenai County, Idaho. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Lakeside Pediatric & Adolescent Medicine, P.L.L.C., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that in October 2024, Defendant became aware of a targeted cyberattack in which a criminal third-party gained unauthorized access to Lakeside Pediatric's network. Certain files that contained Private Information were potentially accessed. These files may have contained personal information such as: names, dates of birth, driver's license and/or state identification numbers, medical record numbers, diagnosis/conditions information, lab results, medications information, health care claims information, clinical/treatment information, and, for a limited number of individuals, Social Security 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 from the Settlement. In this Settlement, the Class Representatives are: Hailey Simcox, on behalf of H.S., a minor, Chloe Alves, on behalf of M.J., a minor, Tyler Stanley, Lisa Keating, on behalf of G.K., a minor, Pamela Moser, on behalf of O.M., a minor, and Brandon Rosen, on behalf of K.R., a minor. 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: "All living individuals residing in the United States who were sent notice, including Notice of this Settlement, that their Private Information may have been involved in the Data Incident."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) Defendant and its officers and directors, and any entity in which Defendant has a controlling interest; (2) all people who properly and timely opt-out of the Settlement Class; (3) the Court, the Judge's immediate family, and Court staff; (4) governmental entities; and (5) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Incident, or who pleads *nolo contendere* to any such charge.

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@LakesideSettlement.com
- Call toll free, 24/7: (833) 360-6841
- By mail:

Lakeside Pediatric Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

All Settlement Class Members may submit a Claim to receive: Medical Data Monitoring **and** Cash Payment for Documented Losses **or** a *Pro Rata* Cash Payment. These benefits are described in more detail below.

MEDICAL DATA MONITORING. All Class Members are eligible to enroll in one year of CyEx Medical Shield Complete. Enrollment codes have been sent to all Class Members by postcard and/or email. If you no longer have your enrollment code, please contact the Settlement Administrator.

This comprehensive service comes with $1 million of medical identity theft insurance, and includes monitoring for:

- healthcare insurance ID exposure
- Medical Record Number (MRN) exposure

- unauthorized Health Savings Account (HSA) spending

AND

CASH PAYMENT FOR DOCUMENTED LOSSES. If you incurred actual, documented out-of-pocket losses traceable to the Data Incident, you may submit a Claim not to exceed **$2,500.00**. The losses must have occurred between October 15, 2024, and January 28, 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 documented 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.

OR

***PRO RATA* CASH PAYMENT.** As an alternative to a *Cash Payment for Documented Losses*, you may submit a Claim for a one-time *Pro Rata* Cash Payment. The exact payment amount will not be known until the submission of all Claims and will be based on the total value of all Valid Claims for *Pro Rata* Cash Payments.

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

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

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

- Email: info@LakesideSettlement.com
- Call toll free, 24/7: (833) 360-6841
- By mail:

Lakeside Pediatric Data 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 Lakeside Pediatric or the Released Parties for any of the Released Claims resolved by this Settlement. The "Releases" section of the Settlement Agreement (Section XI) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.LakesideSettlement.com.

Submitting a Claim Form for a Settlement Class Member Benefits

9. How do I submit a Claim for a Settlement Class Member Benefit?

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

Lakeside Pediatric Data 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, (833) 360-6841, by email info@LakesideSettlement.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 January 28, 2027. If you are submitting a Claim by U.S. mail, the completed and signed Claim Form, including any supporting documentation, must be postmarked no later than January 28, 2027.

11. When will the Settlement Class Member Benefits be issued?

The Court will hold a Final Approval Hearing on February 24, 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 Jeff Ostrow of Kopelowitz Ostrow P.A.; John J. Nelson of Milberg, PLLC; and Jaren Wieland of Mooney Wieland Warren 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 $120,000.00 as reasonable attorneys' fees and reimbursement of litigation costs. If approved, this amount will be paid by Lakeside Pediatric separate and apart from any other benefits and the amount awarded by the Court will not increase or diminish any other benefits.

Class Counsel will also ask for Service Award payments of $1,000.00 for each of the Class Representatives, not to exceed $6,000.00. Any approved Service Award payments will also be paid by Lakeside Pediatric

separate and apart from any other benefits and the amount awarded by the Court will not increase or diminish any other benefits.

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 Settlement Class Member Benefits. However, you will keep any rights you may have to sue Lakeside Pediatric 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 Class Member Benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is December 29, 2026.

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

(1) the name and number of the Litigation: *In re Lakeside Pediatric Data Breach Litigation*, Case No. CV-28-26-1876, pending in the District Court for Kootenai County, Idaho;

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

(3) 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:

Lakeside Pediatric Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be postmarked by **December 29, 2026**. You cannot opt out by telephone or by email.

"Mass" or "class" requests for exclusion filed by third parties on behalf of a "mass" or "class" of Settlement Class Members or multiple Settlement Class Members where the opt-out has not been signed by each and every individual Settlement Class Member will not be allowed.

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 and number of the Litigation: *In re Lakeside Pediatric Data Breach Litigation*, Case No. CV-28-26-1876, pending in the District Court for Kootenai County, Idaho;

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

(3) documentation sufficient to establish membership in the Settlement Class, such as a copy of the Email Notice or Postcard Notice the objector received;

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

(5) the number of times the objector has objected to a class action settlement within the five 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;

(6) 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;

(7) 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;

(8) the identity of all counsel for the objector intending on appearing at the final approval;

(9) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);

(10) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing;

(11) a statement confirming whether the objector and/or objector's counsel utilized any form of artificial intelligence in preparation of the objection; and

(12) 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.

Class Counsel or Defendant's Counsel may take limited discovery of the objector related to the objection, including the taking of the objector's deposition or requiring the objector to produce documents.

To be considered by the Court, you must mail your complete objection to 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 324 W Garden Avenue Coeur d'Alene, ID 83814	Lakeside Pediatric Data Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendants
Jeff Ostrow **KOPELOWITZ OSTROW P.A.** 1 West Las Olas Boulevard, Suite 500 Fort Lauderdale, FL 33301 John J. Nelson **MILBERG, PLLC** 280 S. Beverly Drive, Penthouse Suite Beverly Hills, CA 90212 Jaren Wieland **MOOENY WIELAND WARREN PLLC** 512 Idaho Street, Suite 103 Boise, ID 83702	Casie D. Collignon Sean B. Solis **BAKER & HOSTETLER LLP** 1801 California Street, Suite 4400 Denver, CO 80202

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 Final Approval Hearing

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

The Court will hold a Final Approval Hearing on **February 24, 2027, at 3:00 p.m. Pacific Time**, in the District Court for Kootenai County, Idaho, at 324 W Garden Avenue, Coeur d'Alene, ID 83814.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide whether to approve Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards. The Court will also consider any timely and valid 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 location, date, or time of the Final Approval Hearing may change without further notice. Please check www.LakesideSettlement.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 any Settlement Class Member Benefits.

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.LakesideSettlement.com.

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

- Email: info@LakesideSettlement.com
- Call toll free, 24/7: (833) 360-6841
- By mail:

Lakeside Pediatric Data 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, 324 W Garden Avenue, Coeur d'Alene, ID 83814.

DO NOT CONTACT THE COURT, CLERK OF COURT, OR DEFENDANT'S COUNSEL REGARDING THIS SETTLEMENT