

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Ferry et al., v. Safe Fleet Holdings LLC and Clarience Technologies, LLC

Case No. 26CA-CC00133

Circuit Court for Cass County, Missouri

IF YOUR PRIVATE INFORMATION WAS POTENTIALLY IMPACTED IN THE APRIL 2024 DATA INCIDENT EXPERIENCED BY SAFE FLEET HOLDINGS, LLC, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND YOU MAY BE ENTITLED 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.

- A proposed Settlement has been reached with Clarience Technologies, LLC, and Safe Fleet Holdings, LLC (the “Entities” or “Defendants”) in a class action lawsuit arising out of a cyber incident that resulted in unauthorized access to certain files that contained Personal Information on or before April 13, 2024 (the “Data Incident”). The Personal Information potentially impacted includes names along with one or more of the following: addresses; dates of birth; Social Security numbers; driver’s license numbers; state identification numbers; other government identification numbers; passport numbers; taxpayer identification numbers; financial account information; payment card information; username/email addresses and passwords for non-financial accounts; health insurance information; and medical information.
- The lawsuit is called *Ferry et al., v. Safe Fleet Holdings, LLC and Clarience Technologies, LLC*, Case No. 26CA-CC00133. It is pending in the Circuit Court for Cass County, Missouri (the “Litigation”).
- The Entities deny that they 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.
- Safe Fleet’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 Safe Fleet.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely, but further details are available in the Settlement Agreement, which can be found online at www.SafeFleetDataSettlement.com.***



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.SafeFleetDataSettlement.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 2, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Entities related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	November 2, 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.	November 2, 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 Entities 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. No Settlement Class Member Benefits will be provided unless the Court approves the Settlement, and it becomes final.
- All capitalized terms in this Notice are defined in the Settlement Agreement, including Section II. You can view the Settlement Agreement at www.SafeFleetDataSettlement.com.



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Basic Information

1. Why was this Notice issued?

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

The lawsuit is called *Ferry et al., v. Safe Fleet Holdings, LLC, Clarience Technologies, LLC*, Case No. 26CA-CC00133. It is pending in the Circuit Court for Cass County, Missouri. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the companies they sued, Clarience Technologies, LLC, and Safe Fleet Holdings, LLC, are called the “Defendants”.

2. What is this lawsuit about?

On or about April 13, 2024, Safe Fleet became aware of suspicious activity in its computer systems. In response, Safe Fleet promptly launched an investigation to confirm the nature and scope of the activity. The investigation revealed that an unauthorized actor accessed or took certain information on or before April 13, 2024. Safe Fleet then conducted a thorough review of the information and identified the potential access to personal information such as names; addresses; dates of birth; Social Security numbers; driver’s license numbers; state identification numbers; other government identification numbers; passport numbers; taxpayer identification numbers; financial account information; payment card information; username/email addresses and passwords for non-financial accounts; health insurance information; and medical information.

On May 8, 2026, Plaintiffs filed a class action Complaint against the Entities in the Circuit Court for Cass County, Missouri, alleging negligence, negligence per se, breach of implied contract, invasion of privacy, unjust enrichment, breach of fiduciary duty, and declaratory judgment, in relation to the Data Incident.

The Entities do not in any way acknowledge, admit to, or concede any of the allegations made in the Complaint, and expressly disclaim and deny any fault or liability, or any charges of wrongdoing that have been or could have been asserted in the Complaint. Visit www.SafeFleetDataSettlement.com to view the Complaint.



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 “Settlement Class” or “Class Members”. One court resolves the lawsuit for all Class Members, except for those who opt-out from the settlement. In this proposed Settlement, the Class Representatives are Brian Ferry and David Clement. Everyone included in this Action are members of the Settlement Class.

4. Why is there a Settlement?

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

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 whose Private Information may have been impacted in the Data Incident affecting Defendants on or around April 13, 2024, including all those who received notice of the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) Clariance Technologies, LLC, and Safe Fleet Holdings, LLC, including all persons who are directors, officers, and agents of Clariance Technologies, LLC, and Safe Fleet Holdings, LLC, or its respective subsidiaries and affiliated companies; (ii) any Settlement Class Member that timely and validly requests exclusion from the Settlement in accordance with Section VI (“Opt-Out”); (iii) any judges assigned to this case and their staff and family; (iv) governmental entities; (v) the attorneys representing the Parties in the Action; and (vi) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the Data Incident or who pleads *nolo contendere* to any such charge.

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@SafeFleetDataSettlement.com
- Call toll free, 24/7: 1- (855) 256-5304
- By mail: Safe Fleet Data Incident Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

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

The Settlement Benefits

7. What does the Settlement provide?

All members of the Settlement Class may claim **Credit Monitoring** and **one** of the two **Cash Payment** options.

CREDIT MONITORING SERVICES. All Class Members are eligible to enroll in two years of CyEx Financial Shield Complete. 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.

Your CyEx Financial Shield Complete subscription will become active once the Court grants Final Approval to this Settlement (*i.e.* approves the Settlement).

CASH PAYMENTS. You may claim only **one** payment from the two options.

Compensation for Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$2,500.00**. The losses must have occurred between April 13, 2024, and **December 2, 2026**. You must have also made reasonable efforts to avoid, or seek reimbursement for, the loss.

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 third-party 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 must show that your expenses were because of the Data Incident or more likely than not caused by the Data Incident.

Again, personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but may be used to provide clarification, context, or support for other reasonable documentation.

You cannot claim a payment for expenses that have already been reimbursed by a third party. This includes reimbursement in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by Safe Fleet or otherwise. There will also be no payments for emotional distress, personal/bodily injury, or to punish the Entities.

-OR-

Alternative Cash Payment. *Instead of Compensation for Out-of-Pocket Losses*, you may claim a one-time **\$50.00** 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:

- Email: info@SafeFleetDataSettlement.com
- Call toll free, 24/7: 1- (855) 256-5304
- By mail: Safe Fleet Data Incident Settlement
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8. What claims am I releasing if I stay in the Settlement Class?

If you stay in the Settlement Class and do not opt-out, you won't be able to be part of any other lawsuit against the Entities (and the Released Parties) or separately file a lawsuit about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section X) describes the legal claims that you give up and against whom, if you remain in the Settlement Class. The Settlement Agreement is available at www.SafeFleetDataSettlement.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.SafeFleetDataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Safe Fleet Data Incident Settlement
c/o Settlement Administrator
PO Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-(855) 256-5304, by email info@SafeFleetDataSettlement.com, or by U.S. mail at the address above.

For more information about the Claim Process, please review Section IV of the Settlement Agreement. The Settlement Agreement is available at www.SafeFleetDataSettlement.com.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **December 2, 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 2, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 2, 2026, at 10:30 am (see Question 18 for more information about the Final Approval Hearing)**. If the Court approves the Settlement, then Settlement payments will be distributed for all Valid Claims filed by **December 2, 2026**. More information about this process can be found in the Settlement Agreement (Section IV). The Settlement Agreement is available at www.SafeFleetDataSettlement.com.



Settlement payments cannot be distributed if there are any 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 and check www.SafeFleetDataSettlement.com for updates.

It is your responsibility to inform the Settlement Administrator of any updates to your information after the submission of your Claim Form.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Raina C. Borrelli of Strauss Borrelli PLLC; Grayson Wells of Stranch, Jennings & Garvey, PLLC; and Leigh S. Montgomery of Ellzey, Kherkher, Sanford & Montgomery LLP, to represent you and other member of the Settlement Class (“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 \$250,000.00 as reasonable attorneys’ fees and reimbursement of litigation costs. This amount will be paid by the Entities and is separate from the Entities’ payment of the Settlement Administration Costs and the Settlement Class Member Benefits.

Class Counsel will also ask for Service Award payments of \$2,000.00 for each of the Class Representatives. Service Award payments will also be paid by the Entities and separately from the Entities’ payment of the Settlement Administration Costs and the Settlement Class Member Benefits.

The Court may award less than these amounts.

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 or bound by the Agreement, 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 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 or payment, if you opt-out. However, you will keep any rights you may have to sue the Entities (and the Released Parties) on your own about the legal issues in this case.

The deadline to exclude yourself from the Settlement is **November 2, 2026**.

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

- (1) the name of the Litigation: *Ferry et al., v. Safe Fleet Holdings LLC and Clarience Technologies, LLC*, Case No. 26CA-CC00133, pending in the Circuit Court for Cass County, Missouri;

- (2) your full name, mailing address, telephone number, and email address (if any);
- (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 or a group of persons.

Mail your Request for Exclusion to the Settlement Administrator at:

Safe Fleet Data Incident Settlement
ATTN: Exclusion Request
PO Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **November 2, 2026**.

More information about this process can be found in the Settlement Agreement (Section VI). The Settlement Agreement is available at www.SafeFleetDataSettlement.com.

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 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 Litigation: *Ferry et al., v. Safe Fleet Holdings LLC and Clarience Technologies, LLC*, Case No. 26CA-CC00133, pending in the Circuit Court for Cass County, Missouri;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) information that proves that you are a Settlement Class Member (such as a notice you have received);
- (4) whether the objection applies only to you, or to other Class Members, as well;
- (5) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (6) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information (including any former counsel who may be entitled to compensation for any reason related to the objection);
- (7) whether or not you or your lawyer would like to attend or speak at the Final Approval Hearing;
- (8) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;
- (9) 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 **November 2, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for the Entities postmarked or emailed no later than **November 2, 2026**.

All addresses are provided below.

Clerk of the Court	Settlement Administrator
Clerk of the Court Circuit Court for Cass County, Missouri 2501 W. Mechanic St. Harrisonville, MO 64701	Safe Fleet Data Incident Settlement ATTN: Objections PO Box 25226 Santa Ana, CA 92799-9958
Class Counsel	Counsel for Defendants
Raina C. Borrelli STRAUSS BORRELLI PLLC 980 N Michigan Ave, Suite 1610 Chicago, IL 60611 Grayson Wells STRANCH, JENNINGS & GARVEY, PLLC The Freedom Center 223 Rosa L. Parks Avenue, Suite 200 Nashville, TN 37203 Leigh S. Montgomery ELLZEY KHERKHER SANFORD MONTGOMERY, LLP 4200 Montrose Blvd., Suite 200 Houston, Texas 77006	Carolyn Purwin Ryan MULLEN COUGHLIN LLC 426 W. Lancaster Avenue, Suite 200 Devon, PA 19333

More information about this process can be found in the Settlement Agreement (Section VI). The Settlement Agreement is available at www.SafeFleetDataSettlement.com.

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 or bound by the Settlement Agreement. 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 **November 2, 2026, at 10:30 am Central Time**, in the Division I Courtroom of the Circuit Court for Cass County, Missouri, at 2501 W. Mechanic St. Harrisonville, MO 64701.

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.SafeFleetDataSettlement.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** and be bound by any Judgment issued by the Court along with the terms of the Settlement Agreement.

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.SafeFleetDataSettlement.com.

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

- Email: info@SafeFleetDataSettlement.com
- Call toll free, 24/7: 1- (855) 256-5304
- By mail: Safe Fleet Data Incident Settlement
c/o Settlement Administrator
PO 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, 2501 W. Mechanic St. Harrisonville, MO 64701.

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

