Court of Common Pleas of Wayne County, Pennsylvania

In re: Woodloch Pines Data Breach Litigation
Case No. 594-CV-2024

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE MAY 2024 WOODLOCH PINES, INC.; WOODLOCH SPA RESORT, LP DBA THE LODGE AT WOODLOCH; THE WOODLOCH LODGE AND SPA, LLC, AND WOODLOCH SPA RESORT, LLC 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 Woodloch Pines, Inc.; Woodloch Spa Resort, LP dba The Lodge at Woodloch; The Woodloch Lodge and Spa, LLC, and Woodloch Spa Resort, LLC ("Woodloch") in a class action lawsuit. This case is about the targeted cyberattack on Woodloch's computer systems that occurred in May 2024 (the "Data Incident"). Certain files that contained private information were allegedly accessed. These files may have contained personal information such as names; addresses; Social Security numbers; dates of birth; driver's license or state ID numbers; financial account information; passport numbers; payment card information; taxpayer ID numbers; medical information; and health insurance policy information.
- The lawsuit is called *In re: Woodloch Pines Data Breach Litigation*, Case No. 594-CV-2024. It is pending in the Court of Common Pleas of Wayne County, Pennsylvania (the "Litigation").
- Woodloch 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.
- Woodloch'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 Woodloch.
- 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.woodlochsettlement.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 13, 2027**
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 Woodloch related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	**December 14, 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 14, 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 Woodloch 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 Court of Common Pleas of Wayne County, Pennsylvania, 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: Woodloch Pines Data Breach Litigation*, Case No. 594-CV-2024. It is pending in the Court of Common Pleas of Wayne County, Pennsylvania. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the companies they sued, Woodloch Pines, Inc.; Woodloch Spa Resort, LP dba The Lodge at Woodloch; and The Woodloch Lodge and Spa, LLC, are called the "Defendants."

A related entity, Woodloch Spa Resort, LLC was impacted in the Data Incident and is one of the Released Parties, but is not named as a defendant in the lawsuit.

2. What is this lawsuit about?

This lawsuit alleges that during the May 2024 targeted cyberattack on Woodloch's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names; addresses; Social Security numbers; dates of birth; driver's license or state ID numbers; financial account information; passport numbers; payment card information; taxpayer ID numbers; medical information; and health insurance policy 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 "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 Christopher Rhatigan and Amanda Young. Everyone included in this Action is a Class Member.

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 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 in the United States whose Private Information was implicated in the Data Incident."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) Woodloch and its officers, directors, and related companies; (2) governmental entities; (3) the Judge in this case, and the Judge's family and staff; and (4) anyone who validly excludes themselves from the Settlement.

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@woodlochsettlement.com
- Call toll free, 24/7: (833) 296-0849
- By mail: Woodloch Data Incident Settlement
  c/o Settlement Administrator
  PO Box 25191
  Santa Ana, CA 92799

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

The Settlement Benefits

7. What does the Settlement provide?

Woodloch has agreed to pay for a number of Class benefits, which are explained below. You are eligible to enroll in two years of **Credit Monitoring** from CyEx Financial Shield Complete, and **one** of two **Cash Payment** options.

CREDIT MONITORING. All Class Members are eligible to enroll in two years of CyEx Financial Shield Complete. This comprehensive service comes with $1 million of identity theft 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

Cash Payment A – Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **$3,500.00**. The losses must have occurred between May 4, 2024, and January 13, 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.

Cash Payment B – Alternative Cash Payment. *Instead of a payment for documented losses*, you may claim a one-time **$60.00** 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:

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- Call toll free, 24/7: (833) 296-0849
- By mail: Woodloch Data Incident Settlement
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  PO Box 25191
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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 Woodloch about the issues that this Settlement covers. 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.woodlochsettlement.com.

Submitting a Claim Form for Settlement Benefits

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

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

Woodloch Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (833) 296-0849, by email info@woodlochsettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement Class Member Benefit deadlines?

If you are submitting a Claim Form online, you must do so by January 13, 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 13, 2027.

11. When will the Settlement 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 Class Member Benefits 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 Leigh S. Montgomery of Ellzey Kherkher Sanford Montgomery LLP; Melissa G. Meyer of Levi & Korsinsky, LLP; and Jacob U. Ginsburg of Kimmel & Silverman, P.C., 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 $125,000.00 as reasonable attorneys' fees and reimbursement of litigation costs. This amount will be paid by Woodloch.

Class Counsel will also ask for Service Award payments of up to $2,500.00 for each of the Class Representatives. Service Award payments will also be paid by Woodloch.

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 benefits or payment. However, you will keep any rights you may have to sue Woodloch 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 14, 2026

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

(1) the name of the Litigation: *In re: Woodloch Pines Data Breach Litigation*, Case No. 594-CV-2024, pending in the Court of Common Pleas of Wayne County, Pennsylvania;

(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:

Woodloch Data Incident Settlement
c/o Settlement Administrator
PO Box 25191
Santa Ana, CA 92799

Your Request for Exclusion must be submitted and postmarked by December 14, 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 Litigation: *In re: Woodloch Pines Data Breach Litigation*, Case No. 594-CV-2024, pending in the Court of Common Pleas of Wayne County, Pennsylvania;

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

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

(4) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;

(5) if you or your lawyer have objected in any other cases in the past five years, list the names, courts, the orders ruling on your objections, and civil action numbers for each of those cases;

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

(7) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;

(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 14, 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 Court of Common Pleas of Wayne County 925 Court Street Honesdale, PA 18431	Woodloch Data Incident Settlement c/o Settlement Administrator PO Box 25191 Santa Ana, CA 92799

Class Counsel	Counsel for Defendants
Leigh S. Montgomery **ELLZEY KHERKHER SANFORD MONTGOMERY LLP** 4200 Montrose, Suite 200 Houston, Texas 77006 Melissa G. Meyer **LEVI & KORSINSKY, LLP** 500 5th Avenue, 42nd Floor New York, New York 10110 Jacob U. Ginsburg **KIMMEL & SILVERMAN, P.C.** 30 East Butler Avenue Ambler, Pennsylvania 19002	Jeffrey S. Haut **MCDONALD HOPKINS LLC** 501 South Flagler Drive, Suite 200 West Palm Beach, Florida 33401

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 February 24, 2027 at 9:00 AM Eastern Time, in the Court of Common Pleas of Wayne County, Pennsylvania, 925 Court Street, Honesdale, PA 18431.

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 16**).

The date and time of this hearing may change without further notice. Please check www.woodlochsettlement.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, www.woodlochsettlement.com.

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

- Email: info@woodlochsettlement.com
- Call toll free, 24/7: (833) 296-0849
- By mail: Woodloch Data Incident Settlement
  c/o Settlement Administrator
  PO Box 25191
  Santa Ana, CA 92799

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court at 925 Court Street, Honesdale, PA 18431.

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