NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In The Superior Court of Wayne County State of Georgia

Bates, et al., v. Wayne Memorial Hospital Auxiliary, Inc. d/b/a Wayne Memorial Hospital
Case No. SUCV2025000239

A Court has authorized this Notice. This is not a solicitation from a lawyer.

If your Private Information was potentially involved in a Data Incident that was discovered at Wayne Memorial Hospital on or around June 3, 2024, you may be entitled to Settlement Benefits from a class action settlement.

- A Settlement has been proposed in a class action lawsuit against Wayne Memorial Hospital Auxiliary, Inc. d/b/a Wayne Memorial Hospital ("Defendant") relating to the incident discovered on or around June 3, 2024 (the "Data Incident"). Defendant determined that certain files may have been accessed without authorization between approximately May 30, 2024 to June 3, 2024, and, on or around August 27, 2025, sent out notices to potentially impacted individuals. The Action alleges that Defendant was negligent or otherwise responsible for failing to prevent the Data Incident from occurring. Defendant denies all allegations. The Parties have reached a Settlement to resolve the claims brought in the Action and to provide relief to Settlement Class Members.
- If you received a notice from Defendant that your Private Information may have been impacted as a result of the Data Incident, you are included in this Settlement as a "Settlement Class Member."
- Under the Settlement, Defendant has agreed to pay, or cause to be paid, for the following: (a) Cash Payments; (b) Credit Monitoring; (c) Settlement Administration Costs; and (d) Court-awarded attorneys' fees, costs, and Service Awards.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights and Options		Deadline
DO NOTHING	You will receive a credit monitoring enrollment code, but you will not receive a cash payment. You will remain a member of the Settlement Class, be bound by the Settlement if it is approved by the Court, and give up the right to sue Defendant over the claims resolved by the Settlement.	No Deadline
SUBMIT A CLAIM FORM	The only way to receive a cash payment. Claims must be submitted by December 7, 2026.	**December 7, 2026**
EXCLUDE YOURSELF	If you ask to be excluded, you will not be able to enroll in credit monitoring or receive a cash payment, but you may be able to file your own lawsuit against Defendant, for the same claims. This is the only option that leaves you the potential to file your own lawsuit against Defendant for the claims that are being resolved by the Settlement. To be effective, you must submit a request for exclusion by the deadline.	**November 7, 2026**
OBJECT	If you do not exclude yourself from the Settlement Class, you may submit an objection telling the Court why you do not like the Settlement. If your objection is overruled, you will be bound by the Settlement.	**November 7, 2026**

These rights and options**—and the deadlines to exercise them**—are explained in this Notice. The Court in charge of this case must still decide whether to approve the Settlement and the requested attorneys' fees and costs, service awards and administration costs. No Settlement benefits or payments will be provided unless and until the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. Why did I get this notice?

A Court authorized this Notice because you have the 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 is eligible for the benefits, and how to get them.

The case is known as *Bates, et al., v. Wayne Memorial Hospital Auxiliary, Inc. d/b/a Wayne Memorial Hospital,* Case No. SUCV2025000239 currently pending in the Superior Court of Wayne County State of Georgia (the "Action"). The people who filed this lawsuit are referred to as the "Plaintiffs" or "Class Representatives," and the entity sued is referred to as "Defendant."

2. What is this lawsuit about?

The lawsuit arises from the Data Incident. On or around June 3, 2024, Defendant discovered that unauthorized third parties potentially gained access to its computer systems from approximately May 30, 2024, to June 3, 2024. Plaintiffs allege that Defendant did not adequately protect Private Information and assert claims including negligence, breach of implied contract, and unjust enrichment.

Defendant denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that any law has been violated. Defendant denies all other claims made in the Action. By entering into the Settlement, Defendant is not admitting any wrongdoing.

3. What is a class action?

In a class action, the Class Representatives sue on behalf of all people who are alleged to have similar claims. Together, in the context of a settlement like this one, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely opt out of the Settlement Class.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the claims made in this Action. The Action did not go to trial, and the Court did not decide in Plaintiffs' or Defendant's favor. Instead, Plaintiffs and Defendant agreed to settle the Action. Plaintiffs and the attorneys for the Settlement Class ("Class Counsel") believe the Settlement is best for all Settlement Class Members because of the Settlement benefits made available under the Settlement, the risks and uncertainty associated with continued Action, and the nature of the defenses raised by Defendant.

WHO IS INCLUDED IN THE SETTLEMENT?

5. Who is in the Settlement?

You are a Settlement Class Member if your Private Information was accessible because of the Data Incident which was discovered on or around June 3, 2024. If you are not sure whether you are a Settlement Class Member, you may contact the Settlement Administrator at 1-888-716-0934 or email WMHDataSettlement@cptgroup.com.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (a) all persons who are directors and officers of Defendant; (b)

governmental entities; (c) the Judge assigned to the Action, that Judge's immediate family, and Court staff; and (d) any Settlement Class Member who timely opts-out of the Settlement.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.WMHDataSettlement.com or call the Settlement Administrator's toll-free number at 1-888-716-0934 or email WMHDataSettlement@cptgroup.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

Settlement Class Member Benefits are the Cash Payments and Credit Monitoring that Settlement Class Members may elect in the Settlement.

All Settlement Class Members may elect to file a Claim for Cash Payment A – Documented Losses and Cash Payment B – Alternate Cash. Additionally, all Settlement Class Members will automatically be entitled to enroll in Credit Monitoring.

Cash Payment A – Documented Losses. All Settlement Class Members are eligible to submit a Claim for a Cash Payment for Documented Losses for up to $5,000.00 per Settlement Class Member upon presentment of reasonable documentation of losses related to fraud and/or identity theft as a result of the Data Incident. Documented expenses include, by way of example, unreimbursed losses relating to fraud or identity theft: if (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Incident; (iii) the loss was incurred on or after the date of the Data Incident; and (iv) the Settlement Class Member made reasonable but unsuccessful efforts to avoid, or seek reimbursement for, the loss. To receive payment for documented losses, a Settlement Class Member must complete and submit a Claim Form and include documentation in support of the Claim. Except as expressly provided herein, personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute proper documentation, but may be included to provide clarification, context, or support for other submitted reasonable documentation. Settlement Class Members shall not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including compensation provided in connection with any credit monitoring and identity theft protection product. If a Settlement Class Member does not submit documentation supporting a loss, or if the Settlement Administrator rejects for any reason the Settlement Class Member's Claim and the Settlement Class Member fails to cure the Claim, the Claim will be rejected.

Cash Payment B – Alternate Cash Payment. As an alternative to submitting a Claim for Cash Payment A – Documented Losses, Settlement Class Members may elect to receive Cash Payment B – Alternate Cash, which is a cash payment in the estimated amount of $25.00, which does not require any documentation. Cash Payment B – Alternate Cash Payment awards shall not exceed the $300,000.00 Settlement Cap. If the Settlement Cap is exceeded, the Cash Payment B – Alternate Cash Payment awards will be reduced pro rata until the Settlement Cap is no longer exceeded.

Credit Monitoring. In addition to Cash Payment A or Cash Payment B, all Settlement Class Members are entitled to enroll in two years of single bureau Credit Monitoring services. The monitoring will also include $1,000,000.00 of identity theft insurance. Settlement Class Members will receive an enrollment code with the Notice, which will become effective after final approval.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. Do I need to submit a claim?

If you would like to receive Cash Payment benefits under the Settlement, you must submit a Claim Form. If you do not want to give up your right to sue Defendant about the Data Incident or the issues raised in this case, you must exclude yourself, or opt out, from the Settlement Class. See Question 17 below for instructions on how to exclude yourself. If you wish to object to the Settlement, you must (a) remain a Settlement Class Member (*i.e.*, you may not exclude yourself from the Settlement Class by opting out and also object to the Settlement) and (b) submit a written objection. See Question 20 below for instructions on how to submit an objection.

10. How do I submit a claim?

You must submit a valid and timely Claim Form to the Settlement Administrator by **December 7, 2026.** You will need your name, address, telephone number, and email address (if applicable) and your unique ID and Passcode provided in the Notice sent to you, to file a Claim Form.

Claim Forms can be submitted by mail or online at www.WMHDataSettlement.com. If by mail, the Claim Form must be postmarked by **December 7, 2026.** You may request that a Claim Form be mailed to you by calling 1-888-716-0934 or by writing to:

Wayne Memorial Data Incident
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
WMHDataSettlement@cptgroup.com.

11. What am I giving up so as to receive Settlement Benefits or to stay in the Settlement Class?

Unless you timely submit an opt-out request to exclude yourself, you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders will apply to you and legally bind you. You will not be able to sue or be part of any other lawsuit against Defendant and Released Parties about the legal issues in the Action that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

12. What are the Released Claims?

The Settlement Agreement in Section XI describes the Release, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.WMHDataSettlement.com, in the public Court records on file in this lawsuit. You can also request a copy of the Settlement Agreement be mailed to you by calling or writing to the Settlement Administrator. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

13. What happens if my contact information changes after I submit a claim or receive the Notice?

If you change your mailing address or email address after you submit a Claim Form or after you received the Notice, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by writing to WMHDataSettlement@cptgroup.com or by mail to:

Wayne Memorial Data Incident
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623

14. When will I receive my Settlement Benefits?

If you file a timely and valid Claim Form, payment will be provided by the Settlement Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check the Settlement Website at www.WMHDataSettlement.com, WMHDataSettlement@cptgroup.com or contact the attorneys in Question 15, below, for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court has appointed Leanna A. Loginov of Shamis & Gentile P.A., Laura Van Note of Cole & Van Note, Casondra Turner of Milberg, PLLC, and Daniel Srourian of Srourian Law Firm as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in the Action.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court for an award of attorneys' fees and costs of up to $525,000.00. They will also ask the Court to approve a service award in the amount of up to $2,500.00 each to each of the seven named Plaintiffs, for a total of up to $17,500.00. If awarded by the Court, attorneys' fees and costs and the service awards will be paid by or on behalf of Defendant. The Court may award less than these amounts.

A copy of Class Counsel's motion for attorneys' fees and costs, and service awards will be made available on the Settlement Website at www.WMHDataSettlement.com before the deadline for submission of objections. You may also request a copy be mailed to you by calling the Settlement Administrator.

OPTING OUT OF THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue Defendant on your own based on the claims raised in the Action or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from, or opting out of, the Settlement.

17. How do I get out of the Settlement?

The opt-out request must be personally signed by the Settlement Class Member and contain the name, address, telephone number, and email address (if any), and include a statement indicating a request to be excluded from the Settlement Class in *Bates, et al. v. Wayne Memorial Hospital Auxiliary, Inc. d/b/a Wayne Memorial Hospital,* Case No. SUCV2025000239. The opt-out request must be postmarked and sent to the Settlement Administrator at the following address by **November 7, 2026:**

Wayne Memorial Data Incident
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623

18. If I opt-out, can I get anything from the Settlement?

No. If you opt out, you are telling the Court you do not want to be part of the Settlement. You can only get Settlement benefits if you stay in the Settlement. If you opt out, do not submit a Claim Form.

19. If I do not opt-out, can I sue the Defendant for the same thing later?

No. Unless you opt out, you give up any right to sue Defendant and Released Parties for the claims this Settlement resolves and releases relating to the Data Incident. You must opt out of the Action to start your own lawsuit against Defendant or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

20. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member and do not exclude yourself, you may object to the Settlement by mailing a written objection no later than **November 7, 2026.**

For an objection to be considered by the Court, the objection must state:

a. the objector's full name, mailing address, telephone number, and email address (if any);

b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;

c. 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;

d. the identity of all counsel (if any) 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;

e. 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;

f. whether the objector and/or the objector's counsel used Artificial Intelligence (AI) to assist in drafting their objection and, if so, which platform they used;

g. whether the objector and/or the objector's counsel will appear at the Final Approval Hearing;

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

i. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and

j. the objector's signature (an attorney's signature is not sufficient).

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel. This includes taking depositions and requesting documents.

To be timely, written notice of an objection in the appropriate form must be mailed and postmarked no later than **November 7, 2026**, to the following:

Clerk of the Court	Class Counsel	Defendant's Counsel	Settlement Administrator
Clerk of the Court Superior Court of Wayne County State of Georgia 174 N. Brunswick Street Jesup, GA 31546	Leanna A. Loginov Shamis & Gentile P.A. 14 NE 1st Ave., Suite 705 Miami, Florida 33132 Laura Van Note Cole & Van Note 555 12th Street, Suite 2100 Oakland, CA 94607 Casondra Turner Milberg, PLLC 260 Peachtree Street NW, Suite 2200 Atlanta, GA 30303 Daniel Srourian Srourian Law Firm, P.C. 468 N. Camden Dr., Suite 200 Beverly Hills, CA 90210	David Ross Wilson Elser LLP 1500 K St., NW Suite 330 Washington, DC 20005 Matthew Foree Wilson Elser LLP 3348 Peachtree Rd. NE, Suite 1400 Atlanta, GA 30326	Wayne Memorial Data Incident c/o CPT Group, Inc. PO Box 19504 Irvine, CA 92623

21. What is the difference between objecting and asking to opt-out?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (meaning you do not opt out of the Settlement). Opting out of the Settlement is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt out, you cannot object to the Settlement.

THE FINAL APPROVAL HEARING

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on January 27, 2027 at 1:30 p.m. ET at the Superior Court of Wayne County State of Georgia, located at 174 N. Brunswick Street, Jesup, GA 31546.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's application for attorneys' fees, costs, and the service awards to Plaintiffs. If there are objections, the Court will consider them. The Court may also listen to people who have asked to speak at the hearing. You may attend the hearing at your own expense, or you may pay your own lawyer to attend, but it is not necessary.

Note: The date and time of the Final Approval Hearing are subject to change. Any change will be posted at www.WMHDataSettlement.com.

23. Do I have to attend to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to speak about it. As long as you mail your written objection on time, the Court will consider it.

24. May I speak at the Final Approval Hearing?

Yes, as long as you do not exclude yourself or opt out, you can (but do not have to) participate and speak for yourself in the Action about the Settlement. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you at the hearing, you must follow all of the procedures for objecting to the Settlement listed in Question 20 and specifically include a statement whether you and your counsel (if any) will appear at the Final Approval Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will receive a credit monitoring enrollment code, but you will not receive a cash payment. You will give up rights explained in the "Opting Out from the Settlement" section of this Notice, including your right to start a lawsuit, or be part of any other lawsuit against Defendant or any of the Released Parties about the legal issues in the Action that are released by the Settlement Agreement.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.WMHDataSettlement.com. If you have questions, contact the Settlement Administrator at toll-free 1-888-716-0934 or email WMHDataSettlement@cptgroup.com.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: Wayne Memorial Hospital Data Breach Settlement Resolves Lawsuit Over 2024 Cyber Incident

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