

**NOTICE OF PROPOSED
CLASS ACTION LAWSUIT**

A proposed Settlement has been reached in a class action lawsuit known as *Celeste Brown and Ross Finesmith v. AllCare Plus Pharmacy LLC*, Civil Docket No.: 2484CV02366, in the Commonwealth of Massachusetts, Suffolk County Superior Court. ("Lawsuit").

**YOU ARE ENTITLED TO A PAYMENT
OF AT LEAST \$50**

You may be eligible to receive benefits including a payment of \$50 or free credit reporting provided by IDX and other relief.

You are a Settlement Class Member if your Protected Information was compromised in the Data Security Incident affecting AllCare Plus Pharmacy LLC in or around June 21, 2022.

For more information, please read this postcard Notice and scan this QR Code or visit the Settlement Website at:

www.AllCareSettlement.com



ALLCARE SETTLEMENT
C/O ATTICUS ADMINISTRATION
PO BOX 64053
ST. PAUL, MN 55164

WHAT IS THIS ABOUT? The Lawsuit alleges that around June 21, 2022, AllCare Plus Pharmacy LLC, ("AllCare") became aware that cybercriminals had breached its computer system using phishing emails that targeted the email mailboxes of AllCare's employees. After a reasonable investigation, AllCare determined that a single mailbox was compromised, and certain information was subject to access without authorization and taken from AllCare's systems. The potentially affected information varied by individual but included some or all of the following categories of information: names, addresses, dates of birth, Social Security numbers, driver's license numbers, financial account information, health information, health insurance information, and information about treatments and prescriptions. AllCare maintains that it had meritorious defenses, and it was prepared to vigorously defend the Lawsuit. The Settlement is not an admission of wrongdoing or an indication that AllCare has violated any laws, but rather the resolution of disputed claims. **WHAT ARE THE BENEFITS?** The Settlement includes reimbursement for Ordinary Losses, Extraordinary Losses, Lost Time, and Credit Monitoring or a \$50 Cash Payment. **Ordinary Loss Expense Reimbursement** of up to \$750 for documented losses with supporting documentation, including, without limitation and by way of example, unreimbursed losses related to fraud or identity theft, professional fees including attorneys' fees, accountants' fees, and fees for credit report services; and/or credit monitoring costs and miscellaneous expenses such as fax, postage, copying, and mileage that were incurred on or after the date of the Data Security Incident and were more likely than not caused by the Data Security Incident. **Lost Time Reimbursement** for up to five (5) hours of documented Lost Time spent dealing with the Data Security Incident (\$20 per hour) for a maximum of up to \$100 per person. **Extraordinary Loss Reimbursement** of up to \$5,000 per person for actual, documented and unreimbursed monetary loss that was more likely than not caused by the Data Security Incident and the loss was incurred after the date of the Data Security Incident. **Credit Monitoring:** Two years of **free** Credit Monitoring Services provided through IDX with at least \$1,000,000 in identity theft protection insurance. **Alternative Cash Payment:** In the alternative to a claim for the reimbursement categories above (i.e., Ordinary Losses and Lost Time, Extraordinary Losses, and/or Credit Monitoring), Settlement Class Members can elect a \$50.00 Alternative Cash Payment. **Remedial Relief:** AllCare made certain security changes in response to the Data Security Incident to further protect its customers' PII and PHI. You must file a claim by mail postmarked by July 3, 2025 or online at www.AllCareSettlement.com by July 3, 2025 to receive benefits from the Settlement. **WHAT ARE MY OTHER RIGHTS? Do Nothing:** If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any money; you must submit a claim to get money. **Exclude Yourself:** You can get out of the Settlement and keep your right to sue for the claims in this Lawsuit, but you will not get any money from the Settlement. You must exclude yourself by July 3, 2025. **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be submitted by July 3, 2025. Detailed instructions on how to file a claim, get additional credit monitoring, exclude yourself, or object are on the Settlement Website at www.AllCareSettlement.com. The Court will hold the Final Approval Hearing at Suffolk Superior Court, Courtroom 1015, on August 27, 2025 at 2 p.m. (EDT) to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider an award of combined attorneys' fees and costs of \$185,000 and request the Class Representatives' Service Awards of \$2,500 each, and to consider whether and if it should be approved. You may attend the hearing, but you don't have to. This is only a summary. For additional information, including a copy of the Settlement Agreement, Long Form Notice, Claim Form, Class Counsel's Application for Attorneys' Fees and Expenses, and other documents, visit www.AllCareSettlement.com or call 1-800-355-1535.