

If your Private Information was compromised in the Data Incident involving Washington Gastroenterology, PLLC, on or around October 23, 2024, you may be entitled to Settlement Benefits from a Settlement.

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

- A \$4.6 million Settlement has been reached in a class action lawsuit against Washington Gastroenterology, PLLC (“Defendant”) involving a cybersecurity attack on the Defendant on or around October 23, 2024 (“Data Incident”) and may have resulted in the unauthorized access to Settlement Class Members’ Private Information. Private Information means some combination of Settlement Class Members’ names, Social Security numbers, financial and banking information, medical information, and health insurance information.
- The Settlement Class includes: all living individuals residing in the United States whose Private Information was compromised in the Data Incident, including all those who received notice of the breach.
- If you are a member of the Settlement Class, you can submit a Claim Form for the following Settlement Benefits:

Cash Payment A – Documented Losses: You may submit a Claim Form and provide reasonable documentation for losses related to the Data Incident for up to \$4,000 per Settlement Class Member;

OR

Cash Payment B – Alternate Cash: Instead of Documented Losses, without providing documentation, you may submit a Claim Form to receive a *pro rata* (a legal term meaning equal share) Cash Payment in the estimated amount of \$75;

AND

Medical Record Monitoring: In addition to either Cash Payment A or Cash Payment B, you may also submit a Claim Form to receive two years of one-bureau of a medical record and credit monitoring product.

Your Cash Payment may be subject to a *pro rata* increase or decrease depending upon the total value of all Valid Claims.

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

Your Legal Rights and Options		Deadline
Submit a Claim Form	The only way to get Settlement Benefits is to submit a timely and valid Claim Form.	Submitted or Postmarked by: January 10, 2027
Exclude Yourself	Get no Settlement Benefits. Keep your right to file your own lawsuit against the Released Parties about the legal Released Claims that are released by the Settlement in this lawsuit.	Postmarked by: December 11, 2026
Object to the Settlement	Stay in the Settlement but tell the Court why you do not agree with the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed by: December 11, 2026
Do Nothing	Get no Settlement Benefits. Give up your legal rights.	

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court must decide whether to approve the Settlement attorneys’ fees, costs, and Service Awards. No Settlement Benefits will be provided unless the Court approves the Settlement.

**Questions? Go to www.WAGastroDataIncidentSettlement.com
or call 1-877-377-7781**

BASIC INFORMATION

1. Why is this Notice being provided?

A court authorized this Notice because you have the right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what Settlement Benefits are available, who is eligible for the Settlement Benefits, and how to get them.

The Honorable Clarence Henderson, Jr. of the Superior Court of Washington, County of Pierce, is overseeing this class action. The lawsuit is known as *In re Washington Gastroenterology, PLLC Data Breach Litigation*, Case No. 25-2-11194-1 (“lawsuit”). The individuals who filed this lawsuit are called the “Plaintiffs” and/or “Class Representatives” and the company sued, Washington Gastroenterology, PLLC, is called the “Defendant.”

2. What is this lawsuit about?

Plaintiffs filed this lawsuit against Defendant on behalf of themselves and all others similarly situated involving a cybersecurity attack on Defendant on or around October 23, 2024 (“Data Incident”) and may have resulted in the unauthorized access to Settlement Class Members’ Private Information. Private Information means some combination of Settlement Class Members’ names, Social Security numbers, financial and banking information, medical information, and health insurance information.

Defendant denies the legal claims and denies any wrongdoing or liability. The Court has not made any determination of any wrongdoing by Defendant, or that any law has been violated. Instead, Plaintiffs and Defendant have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

3. Why is the lawsuit a class action?

In a class action, one or more people (called class representatives) sue on behalf of all people who have similar legal claims. Together, all these people are called a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt-out) from the class.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the legal claims made in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of Plaintiffs or Defendant. Instead, Plaintiffs and Defendant have agreed to settle the lawsuit. The Class Representatives, Defendant, and their lawyers believe the Settlement is best for the Settlement Class because of the Settlement Benefits available and the risks and uncertainty associated with continuing the lawsuit.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am included in the Settlement?

You are included in the Settlement Class if you are a living individual residing in the United States whose Private Information was compromised in the Data Incident, including all those who received notice of the breach.

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6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are all persons who are: (a) directors, officers, and employees of Defendant, and any entity in which Defendant has a controlling interest; (b) governmental entities; (c) the Judge assigned to the lawsuit, that Judge's immediate family, and Court staff; (d) any Settlement Class Member who timely and validly opted out of the Settlement; and (e) 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.

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 www.WAGastroDataIncidentSettlement.com or call toll-free 1-877-377-7781.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

If you are a Settlement Class Member, you can submit a Claim Form for the following Settlement Benefits:

Cash Payment A – Documented Losses

You may submit a Claim Form and provide reasonable documentation for losses related to the Data Incident for up to \$4,000 per Settlement Class Member.

Examples of documented losses related to the Data Incident include (without limitation):

1. Monetary losses as a result of actual identity theft if (a) the loss is an actual, documented, and unreimbursed monetary loss; (b) the loss was fairly traceable to the Data Incident; and (c) the loss occurred between October 23, 2024, and the date the Claim was submitted;
2. Postage;
3. Copying, scanning, faxing;
4. Mileage and other travel-related charges;
5. Parking;
6. Notary charges;
7. Research charges;
8. Cell phone charges (only if charged by the minute);
9. Long distance phone charges;
10. Data charges (only if charged based on the amount of data used);
11. Text message charges (only if charged by the message);
12. Bank fees, and
13. Professional fees, such as fees for accountants and attorneys.

You will not be reimbursed for expenses if you have been reimbursed for the same expenses by another source in connection with the identity protection and credit monitoring services offered as part of the notification letter provided by Defendant or otherwise.

If you do not submit reasonable documentation supporting a loss, or if your Claim Form is rejected by the Settlement Administrator, and you fail to cure your Cash Payment A – Documented Losses Claim Form, your Claim Form will be processed as if you elected Cash Payment B – Alternate Cash.

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Cash Payment B – Alternate Cash

Without providing documentation, you may submit a Claim Form to receive a *pro rata* (a legal term meaning equal share) Cash Payment in the estimated amount of \$75.

Your Cash Payment may be subject to a *pro rata* (a legal term meaning equal share) increase or decrease depending upon the total value of all Valid Claims.

For purposes of calculating the *pro rata* increase or decrease, the Settlement Administrator must distribute the funds in the Net Settlement Fund in the following order: 1) Medical Records Monitoring, (2) Cash Payment A – Documented Losses, and (3) Cash Payment B – Alternate Cash Payments. Any *pro rata* increases or decreases to Cash Payments will be on an equal percentage basis.

Medical Record Monitoring

In addition to either Cash Payment A or Cash Payment B, you may also submit a Claim to receive two years of one-bureau of a medical record and credit monitoring product.

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

Unless you exclude yourself (opt-out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Released Parties about the Released Claims in this lawsuit. The specific rights you are giving up are called “Released Claims.”

10. What are the Released Claims?

Section XIII of the Settlement Agreement describes the Releases, Released Claims and Released Parties, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.WAGastroDataIncidentSettlement.com. For questions regarding the Releases, Released Claims, or Released Parties and what the language in the Settlement Agreement means, you can also contact Class Counsel listed below for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

11. How do I submit a Claim Form?

You must submit a timely and valid Claim Form to receive any Settlement Benefits as described above. Your Claim Form must be submitted online at www.WAGastroDataIncidentSettlement.com by **January 10, 2027**, or mailed to the Settlement Administrator at the address on the Claim Form, **postmarked** by **January 10, 2027**. Claim Forms are also available at www.WAGastroDataIncidentSettlement.com or by calling 1-877-377-7781 or by writing to:

Washington Gastroenterology Data Breach Incident
Settlement Administrator
PO Box 6630
Portland, OR 97228-6630

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To

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meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

12. What happens if my contact information changes after I submit a Claim Form?

If you change your mailing address or email address after you submit a Claim Form, 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:

Washington Gastroenterology Data Breach Incident
Settlement Administrator
PO Box 6630
Portland, OR 97228-6630

13. When will I receive my Settlement Benefits?

If you submit a timely and valid Claim Form, Settlement Benefits will be provided 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 www.WAGastroDataIncidentSettlement.com for updates.

EXCLUDE YOURSELF OR OPT-OUT OF THE SETTLEMENT

If you are a member of the Settlement Class and want to keep any right you may have to sue or continue to sue the Released Parties on your own about the legal claims in this lawsuit or 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.

14. How do I opt-out of the Settlement?

To exclude yourself from the Settlement, you must mail a written request for exclusion, which includes the following:

- 1) Your full name, mailing address, telephone number and email address (if any);
- 2) Your personal physical signature; and
- 3) A statement that you want to be excluded from the Settlement Class, such as “I request to be excluded from the Settlement Class in *In re Washington Gastroenterology, PLLC Data Breach Litigation*.”

The exclusion request must be **mailed** to the Settlement Administrator at the following address, and be **postmarked by December 11, 2026**:

Washington Gastroenterology Data Breach Incident
Settlement Administrator
PO Box 6630
Portland, OR 97228-6630

You cannot opt-out (exclude yourself) 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 does not include the required information for each Settlement Class Member that seeks to opt-out and that has not

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been signed by each and every individual Settlement Class Member that seeks to opt-out will not be allowed.

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

15. If I opt-out can I still get anything from the Settlement?

No. If you opt-out, you will not be able to receive Settlement Benefits, and you will not be bound by the Settlement or any judgments in this lawsuit. You can only get Settlement Benefits if you stay in the Settlement and submit a timely and valid Claim Form.

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

No. Unless you opt-out, you give up any right to sue any of the Released Parties for the legal claims this Settlement resolves and Releases, and you will be bound by all the terms of the Settlement, proceedings, orders, and judgments in the lawsuit. You must opt-out of this lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against the Released Parties about the Released Claims in this Settlement. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Settlement and/or attorneys' fees, costs, and Service Awards.

To object, you must file your objection with the Court by **December 11, 2026**, and send your objection by U.S. mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked or shipped by private courier (such as Federal Express) by **December 11, 2026**, stating that you object to the Settlement in *In re Washington Gastroenterology, PLLC Data Breach Litigation*, Case No. 25-2-11194-1.

To file an objection, you cannot exclude yourself from the Settlement Class. Your objection must include all of the following information:

1. Your full name, mailing address, telephone number, and email address (if any);
2. All grounds for the objection, accompanied by any legal support for the objection known to you or your lawyer;
3. The number of times you have objected to a class action settlement within the 5 years preceding the filing of the objection, the caption of each case in which you have made an objection, and a copy of any orders relating to or ruling on your prior objections and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
4. The identity of all lawyers representing you, including any former or current lawyers 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 Award;
5. The number of times your lawyer or your lawyer's law firm have objected to a class action

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settlement within the five years preceding the date of your filed objection, the caption of each case in which your lawyer or your lawyer's law firm have made such objection and a copy of any trial or appellate orders relating to or ruling on those objections;

6. The identity of all lawyers (if any) representing you, and whether they will appear at the Final Approval Hearing;
7. A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
8. A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
9. Your 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 lawyer. This includes taking depositions and requesting documents.

To object, you must file timely written notice with the Court as provided below no later than **December 11, 2026**, and send by U.S. mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator postmarked or shipped by private courier (such as Federal Express) by **December 11, 2026**, at the following addresses.

COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Superior Court of Washington County of Pierce 930 Tacoma Ave. South Tacoma, WA 98402	Raina Borrelli Straus Borrelli PLLC 980 N. Michigan Ave. Suite 1610 Chicago, IL 60611	Jonathan O. Harris Jackson Lewis P.C. 520 Pike Street. Suite 2300 Seattle, WA 98101	<i>Washington Gastroenterology Data Breach Incident</i> Settlement Administrator PO Box 6630 Portland, OR 97228-6630

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, mail at least a week prior to a postmark deadline, get a manual postmark in-person at any post office, or send via Certified Mail.

18. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Opting-out is telling the Court that you do not want to be part of the Settlement Class. If you opt-out, you cannot object because you are no longer part of the Settlement.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this lawsuit?

Yes. The Court has appointed Raina Borrelli and Thomas E. Loeseras 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 if you want someone other than Class Counsel to represent you in this lawsuit.

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20. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees up to 1/3rd of the Settlement Fund, plus reimbursement of reasonable costs. Class Counsel will also ask the Court to approve Service Awards for the Class Representatives of up to \$4,000 each for their efforts. If awarded by the Court, the attorneys' fees and costs, and the Service Awards will be paid from the Settlement Fund. The Court may award less than these amounts.

THE FINAL APPROVAL HEARING

The Court will hold a "Final Approval Hearing" to decide whether to approve the Settlement and attorneys' fees and costs and Service Awards. You may attend and you may ask to speak if you submit an objection by the deadline, but you do not have to.

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

The Court will hold a Final Approval Hearing on **January 29, 2027, at 9:00 a.m. PT** before the Honorable Clarence Henderson, Jr. of the Superior Court of Washington, County of Pierce 930 Tacoma Avenue South, Tacoma, WA 98402. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement and Class Counsel's attorneys' fees and costs, and Service Awards.

If there are objections that were filed by the deadline, the Court will consider them. If you file a timely objection, and you (or your lawyer) would like to speak at the hearing, the Court, at its discretion, may hear objections at the hearing.

Note: The date and time of the Final Approval Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website www.WAGastroDataIncidentSettlement.com to confirm the date and time of the Final Approval Hearing have not changed.

22. 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 file an objection, you do not have to attend the Final Approval Hearing to speak about it. As long as you file a written objection by the deadline, the Court will consider it.

23. May I speak at the Final Approval Hearing?

If there are objections that were submitted by the deadline, the Court will consider them. If you submit a timely objection, and you (or your lawyer) ask to speak at the hearing, the Court, at its discretion, may hear objections at the hearing.

IF YOU DO NOTHING

24. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive Settlement Benefits, and you will give up rights to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit.

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against any of the Released Parties this Settlement resolves and Releases, and you will be bound by all the terms of the Settlement, proceedings, orders, and judgments in the lawsuit.

GETTING MORE INFORMATION

25. How do I get more information?

This Notice summarizes the Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.WAGastroDataIncidentSettlement.com. You may get additional information at www.WAGastroDataIncidentSettlement.com, by calling toll-free 1-877-377-7781, or by writing to:

Washington Gastroenterology Data Breach Incident
Settlement Administrator
PO Box 6630
Portland, OR 97228-6630

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

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