

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Justin McLaughlin and Aturina Eshw v. Taylor University

Cause No. 49D01-2512-CE-056640

Marion County Superior Court, Indiana

IF YOU WERE SENT NOTICE THAT YOUR PRIVATE INFORMATION MAY HAVE BEEN IMPACTED IN THE MAY 2023 TAYLOR UNIVERSITY DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO SETTLEMENT CLASS MEMBER 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 Settlement has been reached with Taylor University (“Taylor University” or “Defendant”) in a proposed class action lawsuit. This case involves a May 2023 cybersecurity incident in which a criminal third party gained unauthorized access to Defendant’s network (the “Data Incident”). The personal information of certain individuals may have been impacted in the Data Incident. This information may have included names, addresses, phone numbers, email addresses, dates of birth, Social Security numbers, photo identification, employer information, and other information.
- The lawsuit is styled *Justin McLaughlin and Aturina Eshw v. Taylor University*, Cause No. 49D01-2512-CE-056640. It is pending in the Marion County Superior Court, Indiana (the “Litigation”).
- Taylor University denies that it did anything wrong, and denies all claims, allegations, and liability. The Court has not made a determination that Taylor University did anything wrong.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- You have been identified as a Settlement Class Member, and you may be entitled to benefits under the Settlement.
- 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 Settlement Class Member Benefits is by submitting a valid and timely Claim Form.	Submitted or postmarked on or before June 29, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no Settlement Class Member Benefits. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	Submitted or postmarked on or before May 29, 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 Class Member Benefits.	Received on or before May 29, 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 Settlement Class Member Benefits and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the Released Claims.	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 Marion County Superior Court, Indiana, 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 styled *Justin McLaughlin and Aturina Eshw v. Taylor University*, Cause No. 49D01-2512-CE-056640. It is pending in the Marion County Superior Court, Indiana. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Taylor University, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that, in May 2023, Defendant became aware of a cybersecurity incident that occurred between February 26, 2023 and May 18, 2023, wherein a criminal third party gained unauthorized access to Defendant’s network. The personal information of certain individuals may have been impacted in the Data Incident. This information may have included names, addresses, phone numbers, email addresses, dates of birth, Social Security numbers, photo identification, employer information, and other 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 Justin McLaughlin and Aturina Eshw. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant 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 Settlement Class Member Benefits. 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 who were mailed Notice, including notice of this Settlement, that their Private Information may have been impacted in the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) all persons who are directors and officers of Defendant and any entity in which Defendant has a controlling interest; (2) governmental entities; (3) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; (4) Settlement Class Members who submit a valid opt-out request prior to the Opt-Out Deadline; and (5) 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 Security Incident, or who pleads *nolo contendere* to any such charge.

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: TaylorUniversityDataSettlement@rg2claims.com
- Call toll free: 1-8866-742-4955
- By mail: Taylor University Data Incident Settlement
c/o Settlement Administrator
P.O. Box 59479
Philadelphia, PA 19102-9479

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

The Settlement Class Member Benefits

7. What does the Settlement provide?

Taylor University has agreed to pay for a number of different benefits, as described below. All Class Members may request payments from one of two **cash payment** categories:

Category 1: Select one or more of the following benefits:

- Reimbursement of Documented Out-of-Pocket Losses
- Compensation for Lost Time
- Credit Monitoring

OR

Category 2: Alternative Cash Payment

- Receive a one-time \$45.00 cash payment

CASH PAYMENTS. You may claim payments from *either* Category 1 or Category 2.

Category 1

Reimbursement of Documented Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses traceable to the Data Incident, you may submit a claim, not to exceed **\$4,000.00**. The losses must have occurred between February 26, 2023, and June 29, 2026.

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
- postage to contact banks by mail

You need to send documented 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.

Compensation for Lost Time. Class Members who spent time responding to the Data Incident may claim up to four hours, at \$20.00 per hour, for a maximum of **\$80.00**.

You must have spent the time on tasks related to the Data Incident. Some examples include things like:

- investigating suspicious activity in your accounts
- researching the Data Incident

You must briefly describe how you spent this time.

Credit Monitoring. Class Members are eligible to enroll in two years of three-bureau credit monitoring offered through IDX. This comprehensive service comes with \$1 million of reimbursement insurance, and includes:

- three-bureau credit monitoring and alerts
- CyberScan dark web monitoring
- fully managed identity restoration
- member advisory services
- lost wallet assistance

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

Category 2

Alternative Cash Payment. Instead of the benefits in Category 1, you may claim a one-time cash payment for **\$45.00**.

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: TaylorUniversityDataSettlement@rg2claims.com
- Call toll free: 1-866-742-4955
- By mail: Taylor University Data Incident Settlement
c/o Settlement Administrator
P.O. Box 59479
Philadelphia, PA 19102-9479

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 Defendant or the Released Parties for any of the Released Claims. 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.TaylorUniversityDataSettlement.com.

Submitting a Claim Form for a Settlement Class Member Benefits

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

To receive a benefit under the Settlement, you must complete and submit a claim for that benefit (a "Claim"). Every Claim must be made on a form ("Claim Form") available at www.TaylorUniversityDataSettlement.com or by calling 1-866-742-4955. Claim Forms will also be sent to Class Members as part of the postcard notice and tear-off Claim Form that will be mailed to Class Members. Read the instructions carefully, fill out the Claim Form, provide the required documentation, and submit it according to the instructions on the Claim Form.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by June 29, 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 June 29, 2026.

11. When will the Settlement Class Member Benefits be issued?

The Court will hold a Final Approval Hearing on August 31, 2026 at 11:30 am ET (*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 payments 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 Lynn A. Toops, Amina A. Thomas, and Taylor E. Cody of CohenMalad, LLP, J. Gerard Stranch, IV and Grayson Wells of Stranch, Jennings & Garvey, PLLC, and Samuel J. Strauss and Raina C. Borrelli of Strauss Borrelli PLLC 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 \$300,000.00 as reasonable attorney's fees and costs of litigation. If approved, these fees and costs will be paid by Defendant. The Court may award less than this amount.

Class Counsel will also ask for Service Awards of \$5,000.00 for each of the Class Representatives, not to exceed \$10,000.00 total. Any approved Service Awards will also be paid by Defendant. The Court may award less than this amount.

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 Class Member Benefits. However, you will keep any rights you may have to sue Defendant or the Released Parties 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 Class Member Benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **May 29, 2026**.

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

- (1) the name and number of the Litigation: *Justin McLaughlin and Aturina Eshw v. Taylor University*, Cause No. 49D01-2512-CE-056640, pending in the Marion County Superior Court, Indiana;
- (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.

Mail your Request for Exclusion to the Settlement Administrator at:

Taylor University Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 59479
Philadelphia, PA 19102-9479

Your Request for Exclusion must be submitted or postmarked by **May 29, 2026**. You cannot opt out by telephone or email.

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 and number of the Litigation: *Justin McLaughlin and Aturina Eshw v. Taylor University*, Cause No. 49D01-2512-CE-056640, pending in the Marion County Superior Court, Indiana;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) documentation that proves that you are a Class Member (such as the Email Notice or PostCard Notice you have received);
- (4) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector’s counsel;
- (5) the number of times you have 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;
- (6) if you have hired your own lawyers, their identity, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the settlement and/or Class Counsel’s Application for Attorneys’ Fees, Costs, and Service Awards;
- (7) the number of times in which your counsel and/or your 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 your counsel and/or your counsel’s law firm have objected to a class action settlement within the preceding five years;
- (8) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (9) if you plan on calling witnesses at the Final Approval Hearing, provide a full list; and
- (10) your signature (an attorney’s 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 **May 29, 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 675 Justice Way Indianapolis, IN 46203	Taylor University Data Incident Settlement ATTN: Objections P.O. Box 59479 Philadelphia, PA 19102-9479

Class Counsel	Counsel for Defendants
Lynn A. Toops Amina A. Thomas Taylor E. Cody COHENMALAD LLP One Indiana Square, Suite 1400	Lisa A. Houssiere BAKER & HOSTETLER LLP 811 Main Street, Suite 1100 Houston, TX 77002

<p>Indianapolis, IN 46204</p> <p>J. Gerard Stranch, IV Grayson Wells STRANCH, JENNINGS & GARVEY, PLLC</p> <p>223 Rosa L. Parks Avenue, Suite 200 Nashville, TN 37203</p> <p>Samuel Strauss Raina Borrelli STRAUSS BORRELLI PLLC</p> <p>One Magnificent Mile 980 N. Michigan Avenue, Suite 1610 Chicago, IL 60611</p>	<p>Georgia L. Bennett BAKER & HOSTETLER LLP 1170 Peachtree Street NE, Suite 2400 Atlanta, GA30309</p> <p>Philip R. Zimmerly Tyler J. Moorhead BOSE MCKINNEY & EVANS LLP 111 Monument Circle, Suite 2700 Indianapolis, IN 46204</p>
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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 Final Approval Hearing

18. When is the Final Approval Hearing?

The Court will hold a Final Approval Hearing on **August 31, 2026 at 11:30 am Eastern Time**, by virtual means.

At the Final Approval Hearing, the Court will decide: (1) whether to approve the Settlement; (2) whether to approve Class Counsel's request for attorneys' fees and costs; and (3) whether to award Service Awards to the Class Representatives. The Court will also consider any timely and valid 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 location, date, or time of this hearing may change without further notice. Please check www.TaylorUniversityDataSettlement.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 any benefits from this Settlement. You will also give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant or the Released Parties related to the Released Claims.

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.TaylorUniversityDataSettlement.com.

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

- Email: TaylorUniversityDataSettlement@rg2claims.com
- Call toll free: 1-866-742-4955
- By mail: Taylor University Data Incident Settlement
c/o Settlement Administrator
P.O. Box 59479
Philadelphia, PA 19102-9479

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 675 Justice Way, Indianapolis, IN 46203.

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