

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If You Were Notified Of A Data Incident Involving Roper St. Francis Healthcare In January 2021, You May Be Eligible For Benefits From A Class Action Settlement.

This is not a solicitation from a lawyer, junk mail, or an advertisement. A Court authorized this Notice.

A proposed Settlement has been reached in a class action, titled *Prevost et al. v. Roper St. Francis Healthcare, C.A. No. 2021-CP-10-01754* (“Action”), filed in the State of South Carolina, County of Charleston, Court of Common Pleas, Ninth Judicial Court.

This Action arises out of an October 2020 phishing incident, involving Roper (the “Data Incident”). Plaintiffs allege that the Data Incident potentially resulted in unauthorized access by a third party to three of Roper’s employees’ email accounts, which may have included the personally identifiable information (“PII”) and protected health information (“PHI”) of approximately 190,000 individuals (the “Data Incident”). Roper disagrees with Plaintiffs’ claims and denies any wrongdoing.

The Settlement Class consists of those who were notified that their PII and/or PHI may have been exposed to unauthorized third parties as a result of the Data Incident experienced by Roper on or around October 2020.

You are included in this Settlement as a Settlement Class Member if you were notified that your PII/PHI may have been impacted in the Data Incident.

Your legal rights are affected regardless of whether you do or do not act. Read this Long Form Notice carefully.

The Court in charge of this case must still decide whether to approve the Settlement, including Class Counsel’s request for attorneys’ Fees, Costs, and Expenses and incentive awards for the Class Representatives. No Settlement benefits will be provided until the Court approves the Settlement, and it becomes Final.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT

Submit a Claim Form	You must submit a Valid Claim to receive Settlement benefits. Claim Forms must be submitted online by the Claims Deadline of May 30, 2024 , or, if mailed, postmarked no later than May 30, 2024
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue and you will not get any compensation.
Exclude Yourself	Get out of the Settlement. Get no compensation. Keep your rights. This is the only option that allows you to keep your right to sue about the claims in this Action. You will not receive any Settlement benefits from the Settlement. Your request to exclude yourself must be postmarked no later than the Opt-Out Date of April 30, 2024 .
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement or Class Counsel’s request for attorneys’ Fees, Costs and Expenses and incentive awards should not be approved. Objections must be postmarked no later than the Objection Date of April 30, 2024 . You will still be bound by the Settlement if the Court approves it.
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details. The Final Fairness Hearing is scheduled for May 2, 2024, at 9:30 A.M. ET .

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BASIC INFORMATION

1. How do I know if I am affected by the Action and Settlement?

You are a Settlement Class Member if you were notified by Roper on or around January 2021 that your PII and/or PHI may have been exposed to unauthorized third parties as a result of the Data Incident.

The Settlement Class specifically excludes: (i) Roper and its respective officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) the Judge and/or magistrate assigned to evaluate the fairness of this Settlement; and (iv) any other Person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the Data Incident or who pleads *nolo contendere* to any such charge.

This Long Form Notice explains the nature of the Action and claims being settled, your legal rights, and the benefits to the Settlement Class.

2. What is this case about?

This case is known as *Prevost et al. v. Roper St. Francis Healthcare*, C.A. No. 2022-CP-10-01754, filed in the State of South Carolina, County of Charleston, Court of Common Pleas, Ninth Judicial Circuit. The Persons who sued are called the “Plaintiffs” and the company they sued, Roper St. Francis Healthcare, is known as the “Defendant” in this case. Roper will be called “Defendant” in this Long Form Notice.

Plaintiffs filed an action against Defendant, individually, and on behalf of anyone whose PII and PHI was potentially impacted as a result of the Data Incident.

This Action arises from an October 2020 phishing incident during which an unauthorized third party gained access to three Roper employee email accounts, which contained PII and/or PHI of approximately 190,000 individuals (the “Data Incident”). Plaintiffs allege that as a result of the Data Incident, the cybercriminals gained access to Plaintiffs’ and the Settlement Class Members’ personal information PII and PHI.

After Roper investigated the Data Incident, those Persons whose PII and PHI may have been impacted by the Data Incident were mailed notification on or about January 2021. Subsequently, this Action and others ultimately consolidated with this Action were filed asserting claims against Defendant relating to the Data Incident.

Defendant denies any wrongdoing or liability, 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 these and all other claims made in the Litigation. By entering into the Settlement, Defendant is not admitting any wrongdoing.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Class Representatives, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, in the best interests for Settlement Class Members. The Court did not decide in favor of the Plaintiff or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available in the Documents section of the Settlement Website.

4. Why is this a class action?

In a class action, one or more people called a “Class Representative” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.”

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

You are included in the Settlement if you were sent a notice of the Data Incident. This Settlement is not open to the general public. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit the **Contact** section of the Settlement Website www.roperdatasettlement.com, call toll free **(833) 462-3479**, or write to *Prevost v. Roper St. Francis Healthcare Settlement*, c/o Kroll Settlement Administration, P.O. Box 225391, New York, NY 10150-5391.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

The Settlement provides for up to \$1,500,000 in benefits for the Settlement Class Members.

The proposed Settlement will provide the following benefits to Settlement Class Members:

Reimbursement Benefits: All Settlement Class Members may submit a Claim to recover compensation for the following:

Ordinary Out-of-Pocket Expenses: All Settlement Class Members who submit a Valid Claim are eligible to recover compensation for up to \$325 of their ordinary unreimbursed out-of-pocket expenses, that were incurred between October 2020 and May 30, 2024, as a result of the Data Incident. These expenses may include:

- a. long distance telephone charges, cell phone minutes (if charged by the minute), Internet usage charges (if either charged by the minute or incurred solely as a result of the Data Incident), costs of credit monitoring services and/or fraud resolution services purchased between October 2020 and May 30, 2024, other losses incurred by Settlement Class Members determined to be fairly traceable to the Data Incident; and compensation for attested-to lost time spent dealing with the Data Incident, at the rate of \$20 per hour for up to four (4) hours of lost time (attestation requires at least a written description of the activities performed during the time claimed and their connection to the Data Incident).
- b. For a Claimant to recover documented costs of credit monitoring services and/or fraud resolution services purchased between October 2020 and May 30, 2024 incurred as a result of the Data Incident, the Claimant must submit (1) a statement that the monitoring or service was purchased primarily because of the Data Incident and not for other purposes; and (2) documentation supporting the cost of the service purchased.

Extraordinary Out-of-Pocket Expenses: Settlement Class Members are also eligible to receive reimbursement for up to \$3,250 per Settlement Class Member for **documented** expenses directly associated with dealing with identity theft or identity fraud related to the Data Incident.

Credit Monitoring Benefits: Settlement Class Members are also eligible to receive twelve (12) months of credit monitoring.

7. How to submit a Claim?

All Claims will be reviewed by the Claims Administrator to determine whether the Claim is a Valid Claim. You must file a Claim Form to get Settlement benefits from the proposed Settlement. Claim Forms must be submitted online by **May 30, 2024**, or postmarked no later than the Claims Deadline of **May 30, 2024**. You can download a Claim Form at www.roperdatasettlement.com or you can call the Claims Administrator at **(833) 462-3479** for a Claim Form.

8. What am I giving up as part of the Settlement?

If you stay in the Settlement, you will be eligible to receive compensation, but you will not be able to sue Roper, its Related Entities, and each of their past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of their respective predecessors, successors, directors, officers, principals, agents, attorneys, insurers, and reinsurers (collectively, the “Released Parties”) regarding the claims in this case.

The Settlement Agreement, which includes all provisions about settled claims, releases, including Released Claims and Released Parties, is available in the Documents section of the Settlement Website at www.roperdatasettlement.com.

The only way to keep the right to sue is to exclude yourself (see Question 10), otherwise you will be included in the Settlement Class, and, if the Settlement is approved, you give up the right to sue for the claims in this case.

9. Will the Class Representatives receive compensation?

Yes. Class Counsel will file a motion requesting that the Class Representatives receive incentive awards to compensate them for their services and efforts in bringing the Action. Roper also agrees not to contest a request for incentive award of up to \$1,500 to the Class Representatives. Roper shall pay any incentive award in addition to any benefits provided to Settlement Class Members. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must send a timely notice of your intent for exclusion from the Settlement Class to the Post Office Box established by the Claims Administrator, stating your full name, address, and telephone number. Your letter must state that you want to be excluded from the Settlement, and include your name, address, and signature. If the opt-out is untimely or otherwise fails to comply with any of the provisions for a valid opt-out, it shall not be considered a valid opt-out.

Your written notice of intent to exclude yourself must be postmarked no later than the Opt-Out Date of **April 30, 2024**, to:

Prevost v. Roper St. Francis Healthcare
c/o Kroll Settlement Administration
P.O. Box 225391
New York, NY 10150-5391

Instructions on how to submit an opt-out request are also available from the Claims Administrator by calling **(833) 462-3479**.

If you exclude yourself, you will not be able to receive any compensation from the Settlement, and you cannot object to the Settlement or Class Counsel’s request for attorneys’ Fees, Costs and Expenses and incentive awards at the Final Fairness Hearing. You will not be legally bound by anything that happens in the Action, and you will keep your right to sue Defendant on your own for the claims that this Settlement resolves.

11. If I do not exclude myself, can I sue Defendant or the Released Parties later?

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Parties (listed in Question 8) for the Released Claims, as set forth in the Settlement Agreement.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement if the Court approves it, you will not get any compensation from the Settlement, you will not be able to start or proceed with an action, or be part of any other action against the Defendant or the Released Parties (listed in Question 8) about the Released Claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed Anastopoulo Law Firm, LLC, Slotchiver & Slotchiver LLP, Brent Southern Halversen, LLC, The Richter Firm, LLC, Solomon Law Group, LLC and Milberg Coleman Bryson Phillips Grossman PLLC (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will apply to the Court for an award of attorneys’ Fees, Costs and Expenses in an amount not to exceed \$515,000, Roper also agrees not to contest a request for incentive award of up to \$1,500 to the named Plaintiffs. Roper shall pay any incentive award in addition to any benefits provided to Settlement Class Members and Notice and Settlement Administration Costs and separate from any award of attorneys’ Fees, Costs, and Expenses. A copy of Class Counsel’s motion for attorneys’ Fees, Costs and Expenses, and incentive awards for Class Representatives will be posted on the Settlement Website in the Documents section before the Objection Date to the Settlement.

Any award for attorneys’ Fees, Costs, and Expenses for Class Counsel will be paid by Roper. The Court will make the final decisions as to the amounts to be paid to Class Counsel and may award less than the amount requested by Class Counsel.

OBJECTING TO THE SETTLEMENT

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

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, including Class Counsel’s request for attorneys’ Fees, Costs, and Expenses, and incentive awards, you must file a written objection with the Court telling it why you do not think the Settlement should be approved.

Objections must be submitted in writing and include all the following information:

- a) the objector’s full name, address, telephone number, and e-mail address (if any);
- b) information identifying the objector as a Settlement Class Member;
- c) a written statement of all grounds for the objection, accompanied by any legal support the objector cares to submit;
- d) the identity of all lawyers (if any) representing the objector;
- e) the identity of all of the objector’s lawyers (if any) who will appear at the Final Fairness Hearing;
- f) a list of all Persons who will be called to testify at the Final Fairness Hearing in support of the objection;
- g) a statement confirming whether the objector intends to personally appear and/or testify at the Final Fairness Hearing; and
- h) the objector’s signature or the signature of the objector’s duly authorized lawyer or other duly authorized representative.

In addition to the above, objections should also provide the following information: (a) a list, by case name, court, and docket number, of all other cases in which the objector (directly or through a lawyer) has filed an objection to any proposed class action settlement within the last three (3) years and (b) a list, by case number, court, and docket number, of all other cases in which the objector has been a named plaintiff in any class action or served as a lead plaintiff or class representative.

To be timely, written notice of an objection in the appropriate form must be mailed, with a postmark date no later than the Objection Date of **April 30, 2024**, to the Court of Common Pleas for the Ninth Judicial Circuit, Class Counsel and Roper’s Counsel at the addresses below:

COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT	CLASS COUNSEL	DEFENSE COUNSEL
<p style="text-align: center;">Clerk of the Court Charleston County Judicial Center 100 Broad Street Charleston, SC 29401</p>	<p style="text-align: center;">Carl L. Solomon SOLOMON LAW GROUP, LLC P.O. Box 1866 Columbia, SC 29202</p>	<p style="text-align: center;">Christopher A. Wiech BAKER & HOSTETLER LLP 1170 Peachtree Street, Ste 2400 Atlanta, GA 30309</p>

You may also file your objection with the Court through the Court’s ECF system, with service on Class Counsel and Roper’s Counsel to be made through the ECF system.

If you do not submit your objection with all requirements, or if your objection is not received by the Objection Date of **April 30, 2024**, you will be considered to have waived all objections and will not be entitled to speak at the Final Fairness Hearing.

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

Objecting is simply telling the Court that you don’t like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you don’t want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

THE FINAL FAIRNESS HEARING

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

The Court will hold the Final Fairness Hearing on **May 2, 2024, at 9:30 A.M. ET** at Charleston County Judicial Center, 100 Broad St., Suite 368, Charleston, SC 29401 in Courtroom 3B, as ordered by the Court. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check this Settlement Website (www.roperdatasettlement.com) for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be finally approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider Class Counsel’s request for an award of attorneys’ Fees, Costs, and Expenses and Class Counsel’s request for incentive awards to the Class Representatives.

After the Final Fairness Hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Fairness Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Fairness Hearing, but that is not necessary. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

19. May I speak at the hearing?

Yes. You can speak at the Final Fairness Hearing, but you must ask the Court for permission. To request permission to speak, you must file an objection according to the instructions in Question 15, including all the information required for you to make an appearance at the hearing. You cannot speak at the hearing if you exclude yourself from the Settlement.

DO NOTHING

20. What happens if I do nothing?

If you do nothing, you will not get any compensation, you will not be able to sue for the claims in this case, and you release the Released Claims, as set forth in the Settlement Agreement, against Defendant and the Released Parties described in Question No. 8.

GET MORE INFORMATION

21. How do I get more information about the Settlement?

This is only a summary of the proposed Settlement. If you want additional information about this Action, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's motion for attorneys' Fees, Costs, and Expenses, and incentive award for Class Representatives, and more, please visit the Settlement Website (www.roperdatasettlement.com) or call **(833) 462-3479**. You may also contact the Claims Administrator at *Prevost v. Roper St. Francis Healthcare Settlement*, c/o Kroll Settlement Administration, PO Box 225391, New York, NY 10150-5391.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE,
DEFENDANT, OR DEFENDANT'S COUNSEL.**