

U.S. District Court for the District of Maryland

**IF YOUR PERSONAL INFORMATION WAS POTENTIALLY AFFECTED BY A DATA SECURITY INCIDENT THAT OCCURRED BETWEEN FEBRUARY 14, 2025, AND MAY 13, 2025, INVOLVING ANNE ARUNDEL DERMATOLOGY, P.A., YOU MAY BE ENTITLED TO BENEFITS FROM A CLASS ACTION SETTLEMENT.**

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

- A \$2,400,000.00 Settlement has been reached in a class action lawsuit against Anne Arundel Dermatology, P.A. (“AAD” or “Defendant”) relating to a Data Security Incident that occurred between February 14, 2025, and May 13, 2025 (“Data Security Incident”).
- No court or jury has found any wrongdoing or liability by AAD. AAD denies all allegations of wrongdoing and maintains that it acted lawfully at all times. The Settlement is not an admission of liability. AAD has entered into this Settlement solely to avoid the time and expense of further litigation.
- You are part of the Settlement Class if you are an individual residing in the United States who provided personal information, including but not limited to PII or PHI, to AAD, or about whom AAD otherwise collected, received, or possessed personal information, including but not limited to PII or PHI, on or before December 9, 2025.
- Under the terms of the Settlement, Settlement Class Members who timely submit a valid Claim Form may be able to recover the following benefits:
  - **Cash Payment A – Documented Out-of-Pocket Losses.** Up to \$5,000.00 for documented, unreimbursed costs that were incurred and arose from the Data Security Incident.
  - **Cash Payment B – Alternative Pro Rata Cash Payment.** In the alternative to Cash Payment A, Settlement Class Members may elect to receive Cash Payment B, which is a *pro rata* cash payment in the estimated amount of \$100.00.
  - **Medical Data Monitoring Services:** Three (3) years of free medical data monitoring provided by CyEx Medical Shield Complete.

**This notice may affect your rights. Please read it carefully.**

Your Legal Rights and Options		Deadline
<b>Submit a Claim Form</b>	The only way to get Settlement benefits is to submit an Approved Claim.	<b>Submitted online or Postmarked by July 8, 2026</b>
<b>Opt-Out of the Settlement</b>	Get no Settlement benefits. Keep your right to file your own lawsuit against Defendant about the legal claims in this lawsuit.	<b>Postmarked by June 9, 2026</b>
<b>Object to the Settlement</b>	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.	<b>Postmarked by June 9, 2026</b>

**Questions? Go to [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or call 1-844-467-4798**

<b>Do Nothing</b>	Get no Settlement benefits. Be bound by the Settlement.	<b>No Deadline</b>
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- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court must still decide whether to approve the Settlement. There will be no Settlement benefits unless the Court approves the Settlement, and it becomes final.

## BASIC INFORMATION

### 1. Why is this Notice being provided?

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

The Honorable George Levi Russell III of the United States District Court for the District of Maryland is overseeing this class action. The lawsuit is known as *In Re Anne Arundel Data Breach Litigation*, Case No. 1:25-cv-02274-GLR (“Action”). The people who filed this Action are called the “Plaintiffs” and/or “Settlement Class Representatives” and the company sued, Anne Arundel Dermatology, P.A. (“AAD”), is called the “Defendant.”

### 2. What is this Action about?

This class action lawsuit arises from an alleged Data Security Incident whereby third parties gained unauthorized access to certain AAD systems between February 14, 2025 and May 13, 2025, resulting in potential access to patients’ personally identifiable information (“PII”) and protected health information (“PHI”). The lawsuit asserts claims against AAD for alleged negligent data security practices and for alleged intentional disclosure of information concerning patients and potential patients.

AAD denies these allegations, maintains that it acted lawfully at all times, and denies that Plaintiffs would prevail or be entitled to any relief should this matter proceed to be litigated. The Court has not decided who is right. Instead, Plaintiffs and Defendant have agreed to a settlement solely to avoid the risk, cost, and time of continuing the Action.

### 3. Why is the Action a class action?

In a class action, one or more people (called plaintiff(s) or class representative(s)) sue on behalf of all people who have similar legal claims. Together, all these people are called a “class” or “class members.” If the plaintiffs and the defendant reach a settlement, the court resolves the issues for all class members via the settlement, except for those class members who timely opt out (exclude themselves) from the settlement.

The proposed Settlement Class Representatives in this Action are Plaintiffs Natalia Correa, Peyton Sulkowski, Jennifer Longwell, Shemika Jones, Brice Farris, Michael Straw, Barbara Buracker, Paul Gale, Earl Beville Jr., Steven Boehm, Paul Madigan, Heidi Shell, Troy Botteon, Richard Bernard, Jason Tyson, Crystal Hall, Terri Wilson, Raven Martin, Jacqueline Smith, Alunda Mitchell (on behalf of J.D., a minor), Diana Wilson, and George Tyler.

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#### 4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the legal claims made in the Action. The Action 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 Action. AAD maintains that it acted lawfully at all times and has entered into this Settlement solely to avoid the time and expense of further litigation. The Settlement Class Representatives believe the Settlement is best for all individuals in the Settlement Class because of the benefits available to the Settlement Class and the risks and uncertainty associated with continuing the Action.

#### WHO IS INCLUDED IN THE SETTLEMENT?

#### 5. How do I know if I am part of the Settlement?

You are part of the Settlement Class if you are an individual residing in the United States who provided personal information, including but not limited to PII or PHI, to AAD, or about whom AAD otherwise collected, received, or possessed personal information, including but not limited to PII or PHI, on or before December 9, 2025. There are approximately 1,905,338 Settlement Class members.

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

Yes. Excluded from the Settlement Class are (i) AAD, any entity in which AAD has a controlling interest, and AAD's officers, directors, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Actions and the members of their immediate families and judicial staff; and (iii) any individual who timely and validly 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.AnnArundelPrivacySettlement.com](http://www.AnnArundelPrivacySettlement.com) or call the Settlement Administrator's toll-free telephone number at 1-844-467-4798.

**PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE, OR DEFENDANT AAD TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

#### THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

#### 8. What does the Settlement provide?

If you are a Settlement Class Member and you timely submit an Approved Claim, you may be eligible for the following Settlement benefits:

**Free Medical Data Monitoring Service.** Settlement Class Members may elect to enroll in credit monitoring and identity theft protection services. All Settlement Class Members are eligible to receive three (3) years of medical data monitoring services, specifically CyEx Medical Shield Complete, which includes the following features:

- (1) real time monitoring of the credit file at one bureau;

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- (2) dark web scanning with immediate notification of potential unauthorized use;
- (3) comprehensive public record monitoring;
- (4) medical record monitoring;
- (5) health insurance plan number monitoring;
- (6) medical beneficiary identifier monitoring;
- (7) health savings account monitoring;
- (8) identity theft insurance (no deductible) up to \$1,000,000.00; and
- (9) access to fraud resolution agents to help investigate and resolve instances of identity theft.

**Cash Payment A – Documented Out-of-Pocket Losses.** If your sensitive information was impacted and you incurred actual, documented out-of-pocket losses due to the Data Security Incident, you may file a claim for reimbursement. The loss must have occurred between February 14, 2025, and July 8, 2026. The maximum amount of this reimbursement is \$5,000.00.

You must provide documentation and an attestation under penalty of perjury related to the Data Security Incident.

This benefit covers out-of-pocket expenses like:

- (1) unreimbursed losses relating to fraud or identity theft;
- (2) bank or other financial institution charges incurred as a result of the Data Security Incident;
- (3) professional fees including attorneys' fees, accountants' fees, and fees for credit repair services;
- (4) costs associated with freezing or unfreezing credit with any credit reporting agency and costs of credit reports;
- (5) credit monitoring costs that were incurred on or after mailing the notice of the cybersecurity incident, through the date of claim submission; and
- (6) miscellaneous expenses such as notary, fax, postage, copying, internet usage, mileage, and long-distance telephone charges;

You must submit documentation, such as receipts, to verify the costs you incurred. You may submit "self-prepared" documents to clarify or support other submitted documentation, but self-prepared documents by themselves are not sufficient to file a valid claim.

**Cash Payment B – Alternative Pro Rata Cash Payment.** In the alternative to Cash Payment A, Settlement Class Members may elect to receive Cash Payment B, which is a *pro rata* cash payment in the estimated amount of \$100.00. All Approved Claims for Alternative Pro Rata Cash Payments (Cash Payment B) will be subject to a pro rata increase or decrease from the estimated \$100.00 amount after payment for Approved Claims for Documented Out-of-Pocket Losses (Cash Payment A), any Service Awards awarded to Settlement Class Representatives, any attorneys' fees and costs awarded to Settlement Class Counsel, and all Costs of Notice and Administration. Any *pro rata* increases or decreases to Cash Payment B will be on an equal percentage basis.

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

Unless you opt out of the Settlement, 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, continue to sue, or be part of any other lawsuit against the Released

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Parties, including Defendant, about the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called “Released Claims.”

#### 10. What are the Released Claims?

The Settlement Agreement Section 13 describes the Release, so please read this section carefully. The Settlement Agreement is available at [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) and in the public Court records on file in this lawsuit. For questions regarding the Release and what the language in the Settlement Agreement means, you can also contact Settlement Class Counsel listed in Question 15 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 make a claim for Settlement benefits?

To receive any of the benefits described in Question 8, you must submit a Claim Form, **postmarked or submitted online by July 8, 2026**. Claim Forms may be submitted online at [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or printed from the Settlement Website and mailed to the Settlement Administrator at the address on the Claim Form. The quickest way to submit a claim is online. Claim Forms are also available by calling 1-844-467-4798 or by writing to:

AAD Settlement Administrator  
P.O. Box 1788  
Baton Rouge, LA 70821

**Claim Forms must be submitted online or by mail postmarked by July 8, 2026.**

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

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 calling 1-844-467-4798 or by writing to:

AAD Settlement Administrator  
P.O. Box 1788  
Baton Rouge, LA 70821

#### 13. When will I receive my Settlement benefits?

If you submit a timely and Approved Claim, payment will be made to you 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 [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) for updates.

#### 14. How will I receive my payment?

If you submit a timely Claim Form for payment, and if your claim and the Settlement are finally approved, you will be sent an electronic payment to the electronic payment option that you selected when you submitted your claim, or will be sent a paper check if you selected that option. Several electronic payment options will be available, or you can select a paper check. Please ensure you have

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provided a current and complete email address. If you select a paper check, the Settlement Administrator will attempt to send you a check relying on your physical address submitted on your Claim Form.

**THE LAWYERS REPRESENTING YOU**

**15. Do I have a lawyer in this lawsuit?**

Yes, the Court has appointed Gary Klinger of Milberg Coleman Bryson Phillips Grossman, PLLC; Tyler Bean of Siri & Glimstad, LLP; James Pizzirusso of Hausfeld LLP; Gary E. Mason of Mason LLP; James P. Ulwick of Kramon & Graham as Class Counsel lawyers 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 Settlement Class Counsel to represent you in this lawsuit.

Settlement Class Counsel may be contacted at the following addresses and phone numbers:

<p>Gary Klinger  <b>MILBERG COLEMAN          BRYSON PHILLIPS          GROSSMAN, PLLC</b>          227 W. Monroe Street, Suite          2100          Chicago, Illinois 60611          T: (866) 252-0878          gklinger@milberg.com</p>	<p>Tyler Bean  <b>SIRI &amp; GLIMSTAD          LLP</b>          745 Fifth Avenue, Suite          500          New York, New York          10151          T: (212) 532-1091          tbean@sirillp.com</p>	<p>James Pizzirusso  <b>HAUSFELD LLP</b>          1201 17th Street N.W.,          Suite 600          Washington, D.C. 20036          T: (202) 540-7200          jpizzirusso@hausfeld.com</p>
<p>Gary E. Mason  <b>MASON LLP</b>          5335 Wisconsin Avenue, NW          Suite 640          Washington, DC 20015          Tel: (202) 429-2290          Email: gmason@masonllp.com</p>	<p>James P. Ulwick,  <b>KRAMON &amp;          GRAHAM, P.A.</b>          750 East Pratt Street, Suite          1100          Baltimore, Maryland          21202          Phone: 410-752-6030          julwick@kg-law.com</p>	

**16. How will Settlement Class Counsel be paid?**

Settlement Class Counsel will file a motion asking the Court to award attorneys’ fees as a percentage of the value conferred by the Settlement on the Settlement Class, plus reimbursement of out-of-pocket litigation expenses. The Court may award less than the amount requested. Settlement Class Counsel will also request approval of Service Awards of one thousand five hundred dollars (\$1,500.00) for each Settlement Class Representative. If awarded by the Court, the Settlement Administrator will pay attorneys’ fees, litigation expenses, and Service Awards out of the Settlement Fund.

Settlement Class Counsel’s motion for attorneys’ fees, litigation expenses, and Service Awards will be made available on the Settlement Website at [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) before the deadline for you to object to or opt out of the Settlement.

**OPTING OUT OF THE SETTLEMENT**

**Questions? Go to [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or call 1-844-467-4798**

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

### 17. How do I opt out of the Settlement?

To opt out of the Settlement, you must timely mail written notice of a request to opt out. The written notice must include:

- (1) The name of the proceedings (*In Re Anne Arundel Data Breach Litigation*, Case No. 1:25-cv-02274-GLR) (D. Md.);
- (2) Your full name, telephone number, and current address. If you are opting out on behalf of a Settlement Class Member, you must provide the full name, telephone number, current address, and your relationship to the Settlement Class Member;
- (3) A statement using the words “request for exclusion” or “opt-out” to indicate your desire to exclude yourself from the Settlement Class or a comparable statement that the individual does not wish to participate in the Settlement at the top of the communication; and
- (4) Your physical signature as a Settlement Class member.

The opt out request must be **mailed** to the Settlement Administrator at the following address, and be **postmarked by June 9, 2026**:

AAD Settlement Administrator  
Exclusions  
P.O. Box 1788  
Baton Rouge, LA 70821

#### **You cannot opt out by telephone.**

“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 an opt out has not been signed by each and every individual Settlement Class Member will not be allowed.

Any Settlement Class Member who does not file a timely request for exclusion will lose the opportunity to exclude himself or herself from the Settlement and will be bound by the Settlement.

### 18. If I opt out can I still get anything from the Settlement?

No. If you opt out, you will not be entitled to receive any Settlement benefits, but you will not be bound by any judgment in this Action. You can only get Settlement benefits if you stay in the Settlement and submit a Valid Claim.

### 19. 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 Defendant and other Released Parties for the legal claims this Settlement resolves and Releases relating to the Data Security Incident. You must opt out of the lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against Defendant or other Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

#### **OBJECTING TO THE SETTLEMENT**

**Questions? Go to [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or call 1-844-467-4798**

## 20. 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 Settlement Class Counsel's motion for attorneys' fees and expenses.

To object, you must submit electronically or mail a timely, written objection with the Clerk of Court stating that you object. Your objection must be submitted electronically or **postmarked by June 9, 2026**.

The objection must also include all of the following information:

- (i) The name of the proceedings: *In re Anne Arundel Data Breach Litigation*, No. 1:25-cv-022743-GLR (D. Md.);
- (ii) The Settlement Class Member's full name, current mailing address, telephone number, and email address;
- (iii) Include the full name, address, telephone number, and email address of the objector's counsel (if the objector is represented by counsel);
- (iv) A statement that describes with specificity the grounds for the objection, as well as any documents supporting the objection;
- (v) A statement as to whether the objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- (vi) A statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing;
- (vii) A list of all other matters in which the objecting Settlement Class Member and/or his/her attorney has lodged an objection to a class action settlement in the previous 24 months and the outcome of those objections; and
- (viii) The signature (or electronic equivalent) of the Settlement Class Member or the Settlement Class Member's attorney.

To be timely, written notice of an objection in the appropriate form must be mailed **postmarked by June 9, 2026**, to the Clerk of Court at:

Clerk of Court  
Objections  
101 W. Lombard St.  
Baltimore, MD 21201

Any Settlement Class Member who fails to comply with the requirements for objecting detailed above will waive and forfeit any and all rights they may have to appear separately and/or to object to the Settlement Agreement and will be bound by all the terms of the Settlement Agreement and by all proceedings, orders, and judgments in the lawsuit.

## 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 or requested attorneys' fees and expenses. 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?

**Questions? Go to [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or call 1-844-467-4798**

The Court will hold a Final Approval Hearing on **July 16, 2026, at 10:00 a.m. ET** before the Honorable George Levi Russell III of the United States District Court for the District of Maryland, 101 W Lombard St, Baltimore, MD 21201.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Settlement Class Counsel’s motion for attorneys’ fees and expenses, and Service Awards. If there are objections, the Court will consider them. The Court will also listen to Settlement Class Members who have asked to speak at the hearing.

**Note:** The date and time of the Final Approval Hearing are subject to change. The Court will decide whether to hold the hearing in person or remotely. Any change will be posted at [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com).

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

No. Settlement Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you mail an objection, you do not have to attend the Final Approval Hearing 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 opt out, you can (but do not have to) participate and speak for yourself at the Final Approval Hearing. 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 Settlement Class Counsel to speak for you at the Final Approval Hearing, you must follow all of the procedures for objecting to the Settlement listed in Question 20 above—and specifically include a statement whether you and your lawyer 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 not receive any Settlement benefits, and you will give up rights explained in the “Opting Out of the Settlement” section of this Notice, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against any of the Released Parties, including Defendant, about the legal issues in this lawsuit that are released by the Settlement Agreement relating to the Data Security Incident.

## 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.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com), by calling 1-844-467-4798 or by writing to:

AAD Settlement Administrator  
P.O. Box 1788  
Baton Rouge, LA 70821

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**PLEASE DO NOT TELEPHONE THE COURT, THE COURT'S CLERK OFFICE, OR  
DEFENDANT AAD REGARDING THIS NOTICE OR THE CLAIMS PROCESS**

**Questions? Go to [www.AnneArundelPrivacySettlement.com](http://www.AnneArundelPrivacySettlement.com) or call 1-844-467-4798**