

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Inline Network Integration LLC (“Inline”) Notified You Of A Data Security Incident, 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 lawsuit known as *Cline v. Inline Network Integration LLC*, Civil Action No.: 2023LA000402 (“Lawsuit”), filed in Illinois Circuit Court of the 18th Judicial Circuit, County of DuPage.
- This Lawsuit arises out of the potential unauthorized access to Inline’s systems, which was discovered by Inline on or about March 12, 2022 (the “Data Security Incident”), and allegations concerning certain files allegedly accessed during the Data Security Incident that may have contained Private Information obtained and maintained by Inline. Allegedly, that Private Information included for some persons full names, addresses, and Social Security Numbers. Inline disagrees with Plaintiffs’ claims and denies any wrongdoing.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) reimbursement for up to \$500 for documented out-of-pocket expenses and fees for credit reports, credit monitoring, or other identity theft insurance products incurred as a result of the Data Security Incident, (2) compensation for up to three (3) hours of lost time spent dealing with the Data Security Incident (\$20 per hour) for a maximum of up to \$60 per Person, and (3) if you were the victim of actual documented identity theft reimbursement for documented extraordinary losses, not to exceed \$5,000 per Settlement Class Member, for proven actual monetary losses.
- Settlement Class Members can enroll in credit monitoring and identity theft protection with \$1 million in insurance. Settlement Class Members who did not enroll in credit monitoring previously offered by Inline will be offered 2 years of credit monitoring. Settlement Class Members who did enroll in credit monitoring previously offered by Inline will be offered an extension of one additional year of credit monitoring. This is subject to confirmation that Inline has the ability to identify those persons who previously enrolled and offer this extension.
- Inline has or will also provide security improvements for the Private Information it maintains.
- You are included in this Settlement as a Settlement Class Member if you are a person residing in the United States to whom Inline sent its notice of a Data Security Incident that Inline discovered on or about March 12, 2022.
- Your legal rights are affected regardless of whether you do or do not act. Read this Notice carefully.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim Form and/or Receive Credit Monitoring	You must submit a valid Claim Form to get money or credit monitoring from this Settlement. Claim Forms must be submitted online by January 5, 2024 or, if mailed, postmarked no later than January 5, 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 money.
Exclude Yourself	Get out of the Settlement. Get no money. Keep your rights. This is the only option that allows you to keep your right to sue about the claims in this Lawsuit. You will not get any money or credit monitoring from the Settlement. Your Opt-Out Request must be postmarked no later than December 6, 2023.
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than December 6, 2023.
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 Approval Hearing is scheduled for December 13, 2023, at 9:30 a.m. CT.

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BASIC INFORMATION

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

You are a Settlement Class Member if you are a person residing in the United States to whom Inline sent its notice of a Data Security Incident that Inline discovered on or about March 12, 2022.

The Settlement Class specifically excludes: (i) Inline Network Integration LLC (“Inline”); (ii) the Related Entities; (iii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iv) any judges assigned to this case and their staff and family; and (v) any other 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 Security Incident or who pleads *nolo contendere* to any such charge.

This Notice explains the nature of the Lawsuit 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 *Cline v. Inline Network Integration LLC*, Civil Action No.: 2023LA000402 (“Lawsuit”), filed in Illinois Circuit Court of the 18th Judicial Circuit, County of DuPage. The Persons who sued are called the “Plaintiffs” and the company they sued, Inline Network Integration LLC, is known as the “Defendant” in this case. Inline will be called “Defendant” in this Notice.

Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of anyone whose Private Information was potentially impacted as a result of the Data Security Incident.

This Lawsuit arises out of potential unauthorized access to Defendant’s systems and certain files containing sensitive information including, but not limited to, for some persons full names, addresses, and Social Security Numbers. Such unauthorized access was discovered by Inline on or about March 12, 2022 (the “Data Security Incident”). After learning of the Data Security Incident, Defendant mailed notification to persons whose Private Information may have been impacted by the Data Security Incident on or about June 2022. Subsequently, this Lawsuit was filed asserting claims against Defendant relating to the Data Security Incident.

Defendant denies any wrongdoing.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Settlement 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 Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at www.inlinedatasettlement.com.

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 are a Person residing in the United States to whom Inline sent its notice of a Data Security Incident that Inline discovered on or about March 12, 2022. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.inlinedatasettlement.com, call toll free (833) 933-6680, or write to *Cline v. Inline Network Integration LLC*, c/o Kroll Settlement Administration, PO Box 5324, New York, NY 10150-5324.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

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

Expense Reimbursement

Documented Ordinary Loss Expense Reimbursement: All Settlement Class Members who submit a valid claim using the Claim Form are eligible for the following documented (except lost time, as defined below) ordinary loss expense reimbursement, not to exceed \$500 per Settlement Class Member: (a) documented out-of-pocket expenses that were incurred as a result of the Data Security Incident, which may include: (i) bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, or gasoline for local travel, (ii) fees for credit reports, credit monitoring, or other identity theft insurance product purchased between March 12, 2022, and the date of the Settlement Agreement.

This list of reimbursable documented out-of-pocket expenses is not meant to be exhaustive, rather it is exemplary. Settlement Class Members may make claims for any documented out-of-pocket losses reasonably related to the Data Security Incident or to mitigating the effects of the Data Security Incident. The Claims Administrator shall have discretion to determine whether any claimed loss is reasonably related to the Data Security Incident

To receive reimbursement for any of the above-referenced documented ordinary loss expenses, Settlement Class Members must submit a valid and timely Claim Form, including necessary supporting documentation, to the Claims Administrator.

Lost Time Reimbursement: Settlement Class Members are also eligible to receive reimbursement for up to three (3) hours of lost time spent dealing with the Data Security Incident (calculated at the rate of \$20 per hour) for a maximum of up to \$60 per Person. Settlement Class Members may receive reimbursement for lost time if the Settlement Class Member certifies that the lost time was spent responding to the Data Security Incident. Claims made for lost time can be combined with reimbursement for documented ordinary loss expense reimbursement and are subject to the same \$500 documented ordinary loss expense reimbursement cap for all Settlement Class Members.

Documented Extraordinary Loss Reimbursement: Settlement Class Members who were the victim of actual documented identity theft are also eligible to receive reimbursement for documented extraordinary losses, not to exceed \$5,000 per Settlement Class Member, including proven actual monetary losses, provided that: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Security Incident; (iii) the loss occurred between March 12, 2022, and the date of the Settlement Agreement; (iv) the loss is not already covered by one or more of the normal reimbursement categories; and (v) the Settlement Class Member made reasonable efforts to avoid, or seek reimbursement for, the loss, including but not limited to exhaustion of all available credit monitoring insurance and identity theft insurance.

Credit Monitoring: Settlement Class Members shall be offered an opportunity to enroll in credit monitoring and identity theft protection with \$1 million in insurance. Settlement Class Members who did not enroll in credit monitoring previously offered by Inline will be offered 2 years of credit monitoring. Settlement Class Members who did enroll in credit monitoring previously offered by Inline will be offered an extension of one additional year of credit monitoring. This is subject to confirmation that Inline has the ability to identify those persons who previously enrolled and offer this extension.

The maximum amount to be paid by Inline and its insurer is capped at no more than \$750,000. In the unlikely event that the total cost of this Settlement would otherwise exceed \$750,000, payments to Settlement Class Members will be reduced on a pro rata basis.

If the Settlement is finally approved by the Court, Settlement Class Members who make timely, valid claims for credit monitoring services will be provided with codes required to activate these services.

Remedial Relief: Inline will continue to provide security for Private Information and protected health information in its possession, custody or control. These security measures will be paid for by Inline separate and apart from other Settlement benefits.

7. How to submit a Claim Form

All Claim Forms will be reviewed by the Claims Administrator for completeness and plausibility. You must file a Claim Form to get money and credit monitoring from the proposed Settlement. Claim Forms must be submitted online by January 5, 2024 or postmarked no later than January 5, 2024. You can download a Claim Form at www.inlinedatasettlement.com or you can call the Claims Administrator at (833) 933-6680 for a Claim Form.

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

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue Inline Network Integration LLC 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, assigns, owners, directors, officers, employees, principals, agents, attorneys, insurers, and reinsurers (collectively, the “Released Persons”) regarding the claims in this case.

The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Persons, is available at www.inlinedatasettlement.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 Settlement Class Representatives receive compensation?

Yes. If approved by the Court, the Settlement Class Representatives will each receive a Service award of up to \$2,500, to compensate them for their services and efforts in bringing the Lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Settlement 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 written Opt-Out Request, stating your full name, address, and telephone number. Your Opt-Out Request must be personally signed by you and contain your original signature (or the original signature of a Person previously authorized by law, such as a trustee, guardian, or Person acting under power of attorney to act on your behalf with respect to a claim or right, such as those in the Lawsuit). Your request must also clearly manifest your intent to be excluded from the Settlement Class, to be excluded from the Settlement, not to participate in the Settlement, and/or to waive all rights to the benefits of the Settlement.

Your written Opt-Out Request must be postmarked no later than **December 6, 2023** to:

Cline v. Inline Network Integration LLC
c/o Kroll Settlement Administration
PO Box 5324
New York, NY 10150-5324

Instructions on how to submit an Opt-Out Request are available at www.inlinedatasettlement.com or from the Claims Administrator by calling (833) 933-6680.

If you exclude yourself you will not be able to receive any cash benefit or credit monitoring from the Settlement, and you cannot object to the Settlement at the Final Approval Hearing. You will not be legally bound by anything that happens in the Lawsuit, 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 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 Persons (listed in Question 8) for the claims this Settlement resolves.

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 money or credit monitoring services from the Settlement, you will not be able to start or proceed with a lawsuit, or be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled 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 Gary M. Klinger of MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN PLLC and Raina Borrelli and Samuel Strauss of TURKE & STRAUSS LLP (called “Settlement 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?

Settlement Class Counsel will apply to the Court for an award of combined attorneys’ fees, costs, and expenses in an amount not to exceed \$250,000. A copy of Settlement Class Counsel’s Motion for attorneys’ fees, costs, expenses, and Service award for Settlement Class Representatives will be posted on the Settlement Website, www.inlinedatasettlement.com, before the Final Approval Hearing. The Court will make the final decisions as to the amounts to be paid to Settlement Class Counsel and may award less than the amount requested by Settlement 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, you must file an 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) State the objecting Settlement Class Member’s full name, current address, telephone number, and email address (if any);
- b) Contain the objecting Settlement Class Member’s original signature;
- c) Set forth information identifying the objector as a Settlement Class Member, including proof that the objector is within the Settlement Class (*e.g.*, copy of the Notice or copy of original notice of the Data Security Incident);
- d) Set forth a statement of all grounds for the Objection, including any legal support for the Objection that the objector believes applicable;
- e) Identify all counsel representing the objector;
- f) State whether the objector and/or his or her counsel will appear at the Final Approval Hearing, and;
- g) Contain the signature of the objector’s duly authorized attorney or other duly authorized representative (if any), along with documentation setting forth such representation.

Your Objection must be filed with the Clerk of Court and include the case name and docket number, *Cline v. Inline Network Integration LLC*, Civil Action No.: 2023LA000402 (“Lawsuit”), filed in Illinois Circuit Court of the 18th Judicial Circuit, County of DuPage (the “*Inline* Action”) to be received no than **December 6, 2023** at:

Office of the Circuit Court Clerk
505 N. County Farm Road
Wheaton, IL 60187-0707

In addition, you must concurrently mail or hand deliver a copy of your objection to Settlement Class Counsel and Inline Counsel, postmarked no later than **December 6, 2023**:

CLASS COUNSEL	INLINE (DEFENSE) COUNSEL
Gary M. Klinger, Esq. MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN PLLC 227 W. Monroe Street Suite 2100 Chicago, IL 60606	Jon Kardassakis LEWIS BRISBOIS BISGAARD & SMITH LLP 633 West 5th Street, Suite 4000 Los Angeles, California 90071

In addition, if the objecting Settlement Class Member intends to appear at the Final Approval Hearing, either with or without counsel, he or she must also file with the Court, and mail or hand-deliver to Settlement Class Counsel and Inline Counsel, a notice of appearance no later than sixty (60) days after the Notice Deadline. If the objecting Settlement Class Member intends to appear at the Final Approval Hearing through counsel, the notice of appearance filed with the Court must also:

- a) Identify the attorney(s) representing the objector who will appear at the Final Approval Hearing;
- b) Include each such attorney's name, address, phone number, email address, state bar(s) to which counsel is admitted, as well as associated state bar numbers;
- c) Include a list identifying all objections each counsel has filed to class action settlements in the past three (3) years, the results of each objection, any court opinions ruling on the objections, and any sanctions issued by a court in connection with objections filed by such attorney, and;
- d) If the objecting Settlement Class Member intends to request permission from the Court to call witnesses at the Final Approval Hearing, the objecting Settlement Class Member must provide a list of any such witnesses together with a brief summary of each witness's expected testimony at least thirty (30) days before the Final Approval Hearing.

If you do not submit your Objection with all requirements, or if your Objection is not received by December 6, 2023, you will be considered to have waived all Objections and will not be entitled to speak at the Final Approval 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 APPROVAL HEARING

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

The Court will hold the Final Approval Hearing on December 13, 2023, at 9:30 a.m. CT in Courtroom 2018, of the Circuit Court of DuPage County, Illinois, 505 N. County Farm Road, Wheaton, IL 60187. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check www.inlinedatasettlement.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 the award of attorneys' fees, costs, and expenses to Settlement Class Counsel and the request for a Service award to the Settlement Class Representatives.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Approval 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 Approval 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 Approval 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.

GET MORE INFORMATION

20. 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 Lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Settlement Class Counsel's Motion for attorneys' fees, costs, expenses, and Service award for Settlement Class Representatives, and more, please visit www.inlinedatasettlement.com or call (833) 933-6680. You may also contact the Claims Administrator at *Cline v. Inline Network Integration LLC*, c/o Kroll Settlement Administration, PO Box 5324, New York, NY 10150-5324.

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