

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Sovos Compliance, LLC (“Sovos”), Or One Of Its Customers, Notified You Of A Data 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 in the amount of \$3,534,128.50 has been reached in a class action lawsuit known as *In re Sovos Compliance Data Security Incident Litigation*, Case No. 1:23-cv-12100 (“Action”), filed in United States District Court District of Massachusetts.
- The Action alleges that on or about May 30, 2023, the MOVEit Transfer application used by Defendant Sovos Compliance, LLC was impacted by a zero-day vulnerability that resulted in the unauthorized access to or acquisition of the Private Information of approximately 490,000 individuals (“Data Incident”). Sovos utilizes the MOVEit Transfer application to help various customers deliver unclaimed property services. Sovos maintains that it has defenses to the Action, and that it was prepared to vigorously defend the lawsuit.
- All Settlement Class Members may elect to receive a Cash Payment and Credit Monitoring, and, if applicable, the California Statutory Award, as set forth below:

Cash Payment A or Cash Payment B: Any Settlement Class Member who submits a Valid Claim may elect to receive Cash Payment A in the form of compensation for unreimbursed ordinary losses, fairly traceable to the Data Incident, up to a total of \$2,000 per person, with supporting documentation; compensation for lost time of \$25 per hour, up to five hours (for a total of \$125) with an attestation including a brief description of the action(s) taken in response to the Data Incident; and compensation for extraordinary losses, up to a total of \$10,000, for actual documented and unreimbursed monetary loss fairly traceable to the Data Incident (“Cash Payment A”); **OR** Cash Payment B in the form of a flat payment in the amount of \$150 (“Cash Payment B”).

California Statutory Claim Payment: In addition to Cash Payment A or Cash Payment B, all California Settlement Subclass members may also elect to receive the California Statutory Award in the amount of \$100.

Credit Monitoring: In addition to Cash Payment A or Cash Payment B and the California Statutory Award, if applicable, all Settlement Class Members may also make a Claim for Credit Monitoring.

All Settlement Class Member Benefits may be subject to a *pro rata* increase or decrease depending upon how many Settlement Class Members make Valid Claims and the value of all Settlement Class Member Benefits claimed.

Cash Payments will be made via check or electronic transfer out of the Net Settlement Fund following the payment of Settlement Administration Costs, Service Awards to Class Representatives of up to \$2,500 per Plaintiff, attorneys’ fees to Class Counsel of up to 33.33% of the Settlement Fund, and reimbursement of reasonable costs to Class Counsel.

- Settlement Class Members are:
 - All living individuals residing in the United States who were sent a notice by Sovos or by a Sovos Customer indicating that their Private Information may have been impacted in the Data Incident.
- California Settlement Subclass members are:
 - All Settlement Class Members residing in California as of May 30, 2023.
- Excluded from the Settlement Class are: (a) all persons who are employees, directors, officers, and agents of Sovos or a Sovos Customer, or their respective subsidiaries and affiliated companies; (b) governmental entities; and (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff.

**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	<p>You must submit a Valid Claim to get a Cash Payment and Credit Monitoring from this Settlement.</p> <p>Claim Forms must be submitted online or mailed and postmarked no later than June 10, 2024.</p>
Do Nothing	<p>If you do nothing, you remain in the Settlement.</p> <p>You also give up your rights to sue Sovos or any of the other Released Parties, including the Sovos Customer(s) that directly or indirectly provided your Private Information to Sovos, and you will not get any of the Settlement Class Member Benefits (cash compensation or offer of free Credit Monitoring).</p>
Opt-Out of the Settlement	<p>Get out of the Settlement. Get no Cash Payment or Credit Monitoring. Keep your rights.</p> <p>This is the only option that allows you to keep your right to sue for the claims being released in the Settlement. You will not get any money from the Settlement.</p> <p>Your request to opt-out must be mailed and postmarked no later than June 24, 2024.</p>
File an Objection	<p>Stay in the Settlement but tell the Court why you think the Settlement should not be approved.</p> <p>Objections must be filed with the Court and postmarked no later than June 24, 2024.</p>
Go to a Hearing	<p>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.</p> <p>The Final Approval Hearing is scheduled for July 23, 2024, at 2:30 p.m. ET.</p>

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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 are an individual residing in the United States who was sent a notice by Sovos or by a Sovos Customer indicating that their Private Information may have been impacted in the Data Incident.

You are also a California Settlement Subclass member if you are a Settlement Class Member and were residing in California as of May 30, 2023.

The Settlement Class specifically excludes: (a) all persons who are employees, directors, officers, and agents of Sovos or a Sovos Customer, or their respective subsidiaries and affiliated companies; (b) governmental entities; and (c) the Judge assigned to the Action, that Judge's immediate family, and Court staff.

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 *In re Sovos Compliance Data Security Incident Litigation*, Case No. 1:23-cv-12100, filed in the United States District Court District of Massachusetts. The persons who sued are called the "Plaintiffs" or "Class Representatives" and the company they sued, Sovos Compliance, LLC, is known as the "Defendant" in this case.

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

The Action alleges there was unauthorized access to or acquisition of the Private Information of Plaintiffs' and approximately 490,000 Settlement Class Members as a result of unauthorized access to the MOVEit Transfer application that Sovos used on or about May 30, 2023. Sovos utilizes the MOVEit Transfer application to help Customers deliver unclaimed property services.

Defendant denies all claims asserted against it in the Action and denies all allegations of wrongdoing and liability.

3. Why is there a Settlement?

The Parties agreed to settle the Action and all claims arising out of or related to the allegations or subject matter of the Consolidated Complaint for the purpose of avoiding the burden, expense, risk, and uncertainty of continuing to litigate the Action. The Plaintiffs, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and in the best interest of the Settlement Class. 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.SovosDataIncidentSettlement.com.

4. Why is this a class action?

In a class action, one or more people called "Class Representatives" 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 Class if you are an individual residing in the United States who was sent a notice by Sovos or by a Sovos Customer indicating that your Private Information may have been impacted in the Data Incident. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.SovosDataIncidentSettlement.com, call toll-free (833) 462-4282, or write to *In re Sovos Compliance Data Security Incident Litigation*, 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:

Cash Payment A

Compensation for Ordinary Losses: All Settlement Class Members are eligible to recover up to a total of \$2,000 of compensation for unreimbursed ordinary losses fairly traceable to the Data Incident that were incurred between May 30, 2023 and June 10, 2024. Settlement Class Members must submit documentation supporting their Claims for ordinary losses. This documentation may include receipts or other documentation not “self-prepared” by the Claimant that documents the costs incurred. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation. Ordinary losses can arise from the following categories:

- (i) *Out of pocket expenses incurred* as a result of the Data Incident, including 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; and
- (ii) *Fees for credit reports, credit monitoring, or other identity theft insurance product* purchased between May 30, 2023, and June 10, 2024 that the Claimant attests he/she incurred as a result of the Data Incident.

Compensation for Lost Time: Settlement Class Members who spent time remedying issues related to the Data Incident may receive reimbursement of \$25 per hour up to five hours (for a total of \$125) with an attestation that includes a brief description of the action(s) taken in response to the Data Incident. No documentation is required.

Compensation for Extraordinary Losses: Settlement Class Members are eligible to recover up to a total of \$10,000 of compensation for extraordinary losses if the extraordinary loss (i) is an actual, documented and unreimbursed monetary loss due to fraud or identity theft; (ii) is fairly traceable to the Data Incident; (iii) occurred after the Data Incident and before the Claim Form Deadline; (iv) is not already covered by one or more of the ordinary loss 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.

Claims will be subject to review for completeness and plausibility by the Settlement Administrator.

To receive reimbursement from the Net Settlement Fund for any of the above-referenced documented ordinary or extraordinary losses, Settlement Class Members must submit a Valid Claim that includes the necessary supporting documentation.

Cash Payment B

Instead of selecting Cash Payment A, Settlement Class Members may elect to receive Cash Payment B, which is a flat payment in the amount of \$150.

California Statutory Claim Payment

In addition to Cash Payment A or Cash Payment B, California Settlement Subclass members who submit a Valid Claim may also elect to receive the California Statutory Award in the amount of \$100.

Credit Monitoring Claims

In addition to Cash Payment A or Cash Payment B and the California Statutory Claim Payment, if applicable, Settlement Class Members may also elect to receive Credit Monitoring with three bureaus. Credit Monitoring will include: (i) real time monitoring of the credit file at all three bureaus; (ii) dark web scanning with immediate

notification of potential unauthorized use; (iii) comprehensive public record monitoring; (iv) identity theft insurance (no deductible); and (v) access to fraud resolution agents to help investigate and resolve instances of identity theft.

Pro Rata Adjustment

Settlement Class Cash Payments and California Statutory Awards will be subject to a *pro rata* increase from the Net Settlement Fund in the event the amount of Valid Claims is insufficient to exhaust the entire Net Settlement Fund. Similarly, in the event the amount of Valid Claims exhausts the amount of the Net Settlement Fund, the amount of the Cash Payments and California Statutory Awards may be reduced *pro rata* accordingly. For purposes of calculating the *pro rata* increase or decrease, the Settlement Administrator must distribute the funds in the Net Settlement Fund first for payment of Credit Monitoring and then for Cash Payments and California Statutory Awards. Any *pro rata* increases or decreases to Cash Payments and California Statutory Awards will be on an equal percentage basis. In the unexpected event the value of Credit Monitoring on its own exhausts the amount of the Net Settlement Fund, the length of the Credit Monitoring provided will be reduced as necessary to bring the cost within the Net Settlement Fund.

7. How do I submit a Claim Form?

You must submit a Claim online at the Settlement Website (www.SovosDataIncidentSettlement.com) or send a hard copy Claim Form to the Settlement Administrator at the following address: *In re Sovos Compliance Data Security Incident Litigation*, c/o Kroll Settlement Administration, PO Box 5324, New York, NY 10150-5324. All Claim Forms will be reviewed by the Settlement Administrator for completeness and plausibility. Claim Forms must be postmarked or submitted online no later than June 10, 2024. For more information, please visit www.SovosDataIncidentSettlement.com, or you can call the Settlement Administrator at (833) 462-4282 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 the benefits outlined herein, but you will not be able to sue Sovos, nor their past, present, or future direct or indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, divisions, officers, directors, shareholders, members, agents, employees, attorneys, insurers, reinsurers, benefit plans, predecessors, successors, managers, administrators, executors, or trustees; nor will you be able to sue Sovos' Customers or Sovos' Customers' past, present, or future direct or indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, divisions, officers, directors, shareholders, members, agents, employees, attorneys, insurers, reinsurers, benefit plans, predecessors, successors, managers, administrators, executors, or trustees (collectively, "Released Parties") regarding claims relating to the Data Incident.

Please note that companies other than Sovos similarly experienced data incidents relating to the MOVEit Transfer application at or around the same time as the Data Incident. By staying in the Settlement Class, you will not be releasing any claims relating to such other data incidents. In addition, by staying in the Settlement Class you will not be releasing any claims against Progress Software or any other non-released party relating to the Data Incident.

The Settlement Agreement, which includes all provisions about Released Claims, releases, and Released Parties, is available at www.SovosDataIncidentSettlement.com.

The only way to keep the right to sue the Released Parties regarding the Data Incident is to opt-out of the Settlement (*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 these claims.

9. Will the Class Representatives receive compensation?

Yes. If approved by the Court, the Class Representatives may each receive a Service Award of up to \$2,500, to compensate them for their services and efforts in bringing the Action. 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 opt-out of the Settlement?

If you do not want to be included in the Settlement, you must “opt-out” by sending a timely request to opt-out, stating your full name, address, and telephone number. Your request to opt-out must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature (or the original signature of a person authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf with respect to a claim or right such as those in the Action); and (c) state your intent to opt-out of the Settlement Class and from the Settlement, not to participate in the Settlement, and/or to waive all rights to the benefits of the Settlement.

Your written request to opt-out must be postmarked no later than **June 24, 2024** to:

In re Sovos Compliance Data Security Incident Litigation
c/o Kroll Settlement Administration
PO Box 5324
New York, NY 10150-5324

Instructions on how to submit a request to opt-out are available at www.SovosDataIncidentSettlement.com or from the Settlement Administrator by calling (833) 462-4282.

If you opt-out, you will not be able to receive any of the Settlement Class Member Benefits, and you cannot object to the Settlement at the Final Approval 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 opt-out, can I sue later?

No. If you do not opt-out of the Settlement, and the Settlement is approved by the Court, you forever give up the right

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 reimbursement from the Settlement, you will not be able to start or proceed with a lawsuit against the Released Parties arising from the Data Incident, or be part of any other lawsuit against the Released Parties (listed in Question 8) related to 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 Mason Barney and Tyler Bean of Siri & Glimstad LLP and Jeff Ostrow of Kopelowitz Ostrow P.A. (“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 file an Application for Attorneys’ Fees, Costs, and Service Awards with the Court. The attorneys’ fees will not exceed 33.33% of the total Settlement Fund. The Settlement Fund is \$3,534,128.50. Class Counsel will also request the payment of reasonable costs incurred in prosecuting the Action. A copy of Class Counsel’s Application for Attorneys’ Fees, Costs, and Service Awards for Class Representatives will be filed with the Court no later than 45 days before the Final Approval Hearing. A copy will be posted on this Settlement Website, www.SovosDataIncidentSettlement.com, before the Final Approval Hearing. The Court will make the final decision as to the amounts to be paid to Class Counsel.

OBJECTING TO THE SETTLEMENT

15. If I do not like the Settlement, how do I tell the Court?

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 and serve it on Class Counsel, Sovos' Counsel, and the Settlement Administrator by June 24, 2024 (the last day of the "Objection Period") stating why you do not think the Settlement should be approved.

To be valid, each objection must set forth the following:

- a. the objector's full name, mailing address, telephone number, and email address (if any);
- b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- c. the number of times the objector has objected to a class action settlement within the 5 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;
- d. the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;
- e. the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the 5 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 the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding 5 years;
- f. the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- g. a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- h. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- i. the objector's signature (an attorney's signature is not sufficient).
Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel.

Your objection must be filed with the Clerk of Court by June 24, 2024 (the last day of the "Objection Period"), and must also include the case name and docket number *In re Sovos Compliance Data Security Incident Litigation*, Case No. 1:23-cv-12100 ("Action"). It gets filed in United States District Court District of Massachusetts. The address of the Clerk of Court is as follows:

Office of District Court of Massachusetts Clerk
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

In addition, you must concurrently mail or hand deliver a copy of your objection to Class Counsel, Sovos' Counsel and the Settlement Administrator, mailed and postmarked no later than **June 24, 2024**:

CLASS COUNSEL	SOVOS' COUNSEL
<p style="text-align: center;">Mason A. Barney Tyler J. Bean Siri & Glimstad LLP 745 Fifth Avenue, Suite 500 New York, NY 10151 mbarney@sirillp.com tbean@sirillp.com</p> <p style="text-align: center;">and</p> <p style="text-align: center;">Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 ostrow@kolawyers.com</p>	<p style="text-align: center;">Michelle L. Visser Orrick, Herrington & Sutcliffe LLP 405 Howard Street San Francisco, CA 94105 mvisser@orrick.com</p>
<p>SETTLEMENT ADMINISTRATOR <i>In re Sovos Compliance Data Security Incident Litigation</i> c/o Kroll Settlement Administration PO Box 5324 New York, NY 10150-5324</p>	

If you do not submit your objection with all requirements, or if your objection is not timely submitted by June 24, 2024, 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. Opting-out is telling the Court that you don't want to be part of the Settlement Class. If you opt-out 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 July 23, 2024, 2:30 p.m. ET in Courtroom 8, 3rd Floor, of the United States District Court District of Massachusetts, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check the Settlement Website 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 the 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 attorneys' fees and costs requested to be paid to Class Counsel, as well as the request for a Service Award to the 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 opt-out 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 Action, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards for Class Representatives when available, and more, please visit the Settlement Website, www.SovosDataIncidentSettlement.com, or call (833) 462-4282. You may also contact the Settlement Administrator at *In re Sovos Compliance Data Security Incident Litigation*, c/o Kroll Settlement Administration, PO Box 5324, New York, NY 10150-5324.

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