

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

You Could Be Affected by a Class Action Settlement involving a Cyberattack

A federal court authorized this notice. This is not a solicitation from a lawyer. You are not being sued.

- There is a proposed Settlement in a class action lawsuit against CareFirst BlueCross BlueShield. CareFirst has defended the lawsuit and maintains that it has not done anything wrong.
- This notice explains the Settlement, the Settlement Class, and your legal rights and options.
- You should read this notice carefully to learn whether you are a member of the Settlement Class.

Important things to know:

- If you take no action, you will still be bound by the Settlement and its releases.
- You can learn more at www.AttiasClassAction.com.

Information About the Lawsuit and the Settlement

What is this Lawsuit About?

Class Representatives Chantal Attias, Andreas Kotzur, Richard Bailey, Latanya Bailey, Curt Tringler, Connie Tringler, and Lisa Crider (formerly known as Huber) (the “Class Representatives”) filed a class action lawsuit in federal court against four CareFirst entities (“Defendant” or “CareFirst”) alleging that they breached insurance contracts with members when unknown, third-party cyberattackers hacked into CareFirst’s network in 2014 and accessed some members’ names, birthdates, email addresses, and subscriber identification numbers (the “2014 data breach”). No passwords, Social Security numbers, health information, or financial information was accessed. Class Representatives alleged that Defendant failed to adopt appropriate network security measures to prevent the attack.

Defendant denies that it did anything wrong or that it violated any laws. This Notice should not be interpreted as an expression of the Court’s opinion about which side is right or wrong. If the Parties had not reached a settlement, Defendant would have vigorously defended the lawsuit and asked for a ruling in its favor.

Within the Settlement, you may be a potential member of the “Settlement Class.” The Settlement Class contains all natural persons who purchased and/or possessed health insurance from CareFirst and whose personally identifiable information, personal health information, sensitive personal information was breached as a result of the 2014 data breach, which CareFirst announced on or about May 20, 2015.

Questions? Please visit www.AttiasClassAction.com for more information.

Para una notificación en Español, Hamar o visitar nuestro sitio web.

Proposed Settlement Benefits

The benefits for Settlement Class Members fall under the category of injunctive relief. An injunction occurs when a court orders a person to do or not to do something, in this case, effecting certain requirements for CareFirst's business practices. The Settlement requires the Defendant, at its expense, to maintain certain features within its network security. All Settlement Class Members will receive the benefit from CareFirst continuing these business practices. For more detailed information about the injunctive relief, please visit www.AttiasClassAction.com.

Because these procedures are being accomplished through a Court injunction, the federal district court for the District of Columbia will retain ongoing supervision and enforcement of these changes. The specific terms of these changes are included in the Settlement Agreement, a copy of which is available at www.AttiasClassAction.com.

There will be no payments to Settlement Class Members, and Settlement Class Members do not release the ability to bring any claims for damages against the Defendant on an individual basis. Settlement Class Members will not be able to bring a future class action for claims regarding the allegations in the Lawsuit.

Defendant has agreed to pay all costs associated with publishing this notice, implementing the procedures described in the Court's injunction, and administering the Settlement. Defendant has agreed to pay Class Counsel's attorneys' fees and costs, in an amount subject to Court approval.

Settlement Class Members do not have to pay or buy anything to benefit from the Settlement Agreement.

What do I do next?

Your Legal Rights and Options in this Proposed Settlement

- Do Nothing

If you do nothing, you will be bound by the Court's decision regarding the Settlement. You will not be able to pursue any potential collective or class action claims against the Defendant that have been released as part of the Settlement. Review the full release at www.AttiasClassAction.com.

- Object to the Settlement

You have the right to write to the Court to object to the Settlement.

You may object to all or part of the Settlement if you think it is not fair, reasonable, and/or adequate. To object, you must file with the Court and send copies to the Parties' counsel, a written explanation of the reasons you think that the Court should not approve the Settlement. The objection must include the following: (1) your full name, address, and current telephone number; (2) if you are represented by counsel, the name and telephone

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number of counsel; (3) all objections and the basis for any such objections stated with specificity, including a statement as to whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (4) the identity of any witnesses you may call to testify; (5) a listing of all exhibits you intend to introduce into evidence at the Final Approval Hearing, including a copy of such exhibits; (6) a statement regarding whether you intend to appear at the Final Approval Hearing; and (7) your signature and a notation that the objection is for “*Attias v. CareFirst*, Civil Action No. 1:15-cv-00882-CRC.”

If you object according to the steps above, the Court will consider your objection. If it overrules your objection, you will be bound by the Court’s decision and will remain part of the Settlement Class.

Your deadline to object to the Settlement is June 20, 2025.

Read on to understand the specifics of the Settlement. The Court still has to decide whether to grant final approval of the Settlement.

When and Where Will the Court Decide Whether to Approve the Settlement?

The Court will hold a Final Approval Hearing on July 17, 2025 at 10 a.m. before the Honorable Christopher Cooper, in the United States District Court for the District of Columbia, E. Barrett Prettyman U.S. Courthouse, 333 Constitution Ave. NW, Washington, DC 20001. At the Final Approval Hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court will also hear objections to the Settlement, if any. We do not know how long the Court will take to make its decision after the hearing. In addition, the hearing may be rescheduled at any time by the Court without further notice to you. You should check the website www.AttiasClassAction.com to confirm the hearing date, the court approval process, and the Effective Date of the Settlement.

If the Court approves the Settlement, the Court’s judgment as to the Settlement Class will be binding on all Settlement Class Members.

Who are the Attorneys Representing the Class and How Will They be Paid?

The Court has approved lawyers to represent the Settlement Class (“Class Counsel”). If you prefer to hire your own attorney to represent you in this case, you may do so at your own expense. The attorneys who have been appointed by the Court to represent the Settlement Class are:

Christopher T. Nace, Esquire
Paulson & Nace, PLLC
1025 Thomas Jefferson Street, NW, Suite 810
Washington, DC 20007

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Jonathan B. Nace, Esquire
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Rockville, Maryland 20850

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Matthew Stonestreet, Esquire
The Giatras Law Firm, PLLC
118 Capitol Street, Suite 400
Charleston, West Virginia 25301

You will not be charged for these lawyers. Subject to Court approval, Class Counsel will seek attorneys' fees and costs as provided in the Settlement Agreement. Class Counsel will also seek a service award as provided in the Settlement Agreement in the amount of \$3,500 to be paid to each Class Representative for their services in representing the Settlement Class.

Additional Information

This notice is only a summary of the proposed Settlement. You can review more details about the proposed Settlement and access additional documents, including the full Settlement Agreement, at the Settlement Website (www.AttiasClassAction.com).

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