

## NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

### **If Your Protected Health Information or Personally Identifiable Information (“Private Information”) Was Accessed in the Data Breach Announced by Defendant Wilkes University (“Defendant”) on October 8, 2025, 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 *Dean Ambosie, et al v. Wilkes University*, No. 2025-12631 (the “Action”), filed in the Court of Common Pleas of Luzerne County, Pennsylvania.
- This Action arises out of unauthorized access to Defendant’s systems and certain files containing Private Information that was announced by Defendant on or about October 8, 2025. The Action was filed by certain individuals (“Plaintiffs”) who claim that Defendant’s data-security measures were inadequate to protect their Private Information. Defendant denies Plaintiffs’ claims and any wrongdoing.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) up to \$5,000.00 for documented out-of-pocket expenses; (2) flat cash payment of \$70.00; and (3) three years of single-bureau Credit Monitoring.
- You are included in this Settlement as a Settlement Class Member if your Private Information was accessed in the Data Breach announced by Defendant on October 8, 2025.
- 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**

<b>Submit a Claim</b>	<p><b>You must submit a Valid Claim to get money from this Settlement.</b></p> <p>Claim Forms must be submitted online by September 3, 2026, if mailed, postmarked no later than September 3, 2026.</p>
<b>Exclude Yourself</b>	<p><b>Get out of the Settlement. Get no money. Keep your rights.</b></p> <p>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 from the Settlement.</p> <p>Your request to exclude yourself must be postmarked no later than August 4, 2026.</p>
<b>File an Objection</b>	<p>Stay in the Settlement but tell the Court why you think the Settlement should not be approved.</p> <p>Objections must be postmarked no later than August 4, 2026.</p>
<b>Go to a Hearing</b>	<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 October 6, 2026.</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 your Private Information was accessed in the Data Breach announced by Defendant on October 8, 2025.

### 2. What is this case about?

This case is known as *Dean Ambosie, et al v. Wilkes University*, No. 2025-12631 (the “Action”), filed in the Court of Common Pleas of Luzerne County, Pennsylvania. The persons who sued are called the “Plaintiffs” and the entity they sued, Wilkes University, is known as the “Defendant” in this case.

Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of anyone whose Private Information was potentially accessed in the Data Breach. They claim Defendant’s data-security measures were inadequate to protect their Private Information. Defendant denies Plaintiffs’ claims and any wrongdoing.

### 3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. Plaintiffs, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class Members. The Court did not decide in favor of Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at [www.WUDataSettlement.com](http://www.WUDataSettlement.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 a Settlement Class Member if your Private Information was accessed in the Data Breach announced by Defendant on October 8, 2025.

If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit [www.WUDataSettlement.com](http://www.WUDataSettlement.com), call toll free 1-866-742-4955, send an email to [WUDataSettlement@RG2claims.com](mailto:WUDataSettlement@RG2claims.com), or write to Wilkes University Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

## 6. What does this Settlement provide?

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

### Expense Reimbursement

**Cash Payment A - Documented Losses:** Settlement Class Members may submit a claim for a Cash Payment of up to \$5,000.00 per Settlement Class Member upon presentment of proper documented losses for fraud and identity theft reasonably traceable to the Data Breach. To receive reimbursement for these losses, Settlement Class Members must submit a valid and timely claim, including necessary supporting documentation to the Settlement Administrator. That means documentation contemporaneously generated or prepared by a third party or the Settlement Class Member supporting a claim for expenses paid. Non-exhaustive examples of reasonable documentation include telephone records, correspondence including emails, or receipts. Personal certifications, declarations, or affidavits from the Settlement Class Member do not, without more, constitute reasonable documentation but may be included to provide clarification, context, or support for other third-party reasonable documentation submitted with the Claim.

**Cash Payment B - Flat Cash Payment:** Settlement Class Members may make a claim for a flat cash payment of \$70.00 without the need to document losses incurred as a result of the Data Breach.

**Credit Monitoring:** Settlement Class Members may elect to receive three years of single-bureau Credit Monitoring.

## 7. How do I submit a claim?

All claims will be reviewed by the Settlement Administrator. You must file a Claim Form to get any money from the proposed Settlement. Claim Forms must be submitted online or postmarked no later than **September 3, 2026**. You can download a Claim Form at [www.WUDataSettlement.com](http://www.WUDataSettlement.com), send an email to [WUDataSettlement@RG2Claims.com](mailto:WUDataSettlement@RG2Claims.com), or call the Settlement Administrator at 1-866-742-4955. The unique Class Member ID and PIN that were printed on the Notice you received will be required to access the online and paper 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 Defendant and the Released Parties 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 regarding the claims in this case. The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Parties, is available at [www.WUDataSettlement.com](http://www.WUDataSettlement.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, if the Settlement is approved, and you give up the right to sue for the claims in this case.

## 9. Will the Class Representative receive compensation?

Yes. The Class Representatives will receive a service award of up to \$2,500 each and up to \$1,000 for the Federal Plaintiff, to compensate them for their services and efforts in bringing the lawsuit.

### 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 request for exclusion. Your request for exclusion must be individually signed by you and must include your name, address, telephone number, and email address (if any). Your request must clearly manifest your intent to be excluded from the Settlement.

Your written request for exclusion must be postmarked no later than **August 4, 2026** to:

Wilkes University Settlement  
c/o RG/2 Claims Administration LLC  
P.O. Box 59479  
Philadelphia, PA 19102-9479

Instructions on how to submit a request for exclusion are available at [www.WUDataSettlement.com](http://www.WUDataSettlement.com), or from the Settlement Administrator by calling 1-866-742-4955.

If you exclude yourself, you will not be able to receive any benefits from the Settlement and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit and you will keep your right to sue the 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 Parties (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 benefits from the Settlement, and you will not be able to start or proceed with a lawsuit or be part of any other lawsuit against the Released Parties (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 Leanna A. Loginov of the law firm SHAMIS & GENTILE, P.A., Kenneth J. Grunfeld of the law firm KOPELOWITZ OSTROW, P.A., and Gerald D. Wells, III of the law firm LYNCH CARPENTER LLP (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 litigation expenses in an amount not to exceed \$300,000. A copy of Class Counsel’s Application for Attorneys’ Fees, Costs, and Expenses will be posted on the Settlement Website, [www.WUDataSettlement.com](http://www.WUDataSettlement.com), before the Final Approval Hearing. 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, you can submit an objection telling it why you do not think the Settlement should be approved. Objections must be submitted in writing and include all the following information:

Such notice shall state:

- (a) the objector’s full name, address, telephone number, and e-mail 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 five 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 five 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 five 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).

Your Objection must include the case name and docket number, *Dean Ambosie, et al v. Wilkes University*, No. 2025-12631, and be filed with the Clerk of the Court and sent by U.S. Mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator, as follows:

<b>CLERK OF THE COURT</b>	<b>CLASS COUNSEL</b>	<b>DEFENSE COUNSEL</b>	<b>SETTLEMENT ADMINISTRATOR</b>
Clerk of the Court Court of Common Pleas Luzerne County Courthouse 200 N. River Street Wilkes-Barre, PA 18711	LYNCH CARPENTER, LLP Attn: Gerald D. Wells, III 1760 Market Street Suite 600 Philadelphia, PA 19103  SHAMIS & GENTILE, P.A. Attn: Leanna A. Loginov 14 NE 1 <sup>st</sup> Ave, STE 705 Miami, FL 33132  KOPELOWITZ OSTROW, P.A. Attn: Kenneth J. Grunfeld 1 West Las Olas Blvd, 5 <sup>th</sup> FL Ft. Lauderdale, FL 33301	McDONALD HOPKINS Attn: Christopher G. Dean 600 Superior Ave E Suite 2100 Cleveland, OH 44114	Wilkes University Data Settlement c/o RG/2 Claims Administration LLC P.O. Box 59479, Philadelphia, PA 19102-9479

If you do not submit your objection with all requirements, or if your objection is not received by **August 4, 2026**, 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 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 **October 6, 2026 at 9:30 a.m.** at the Court of Common Pleas, 200 N. River Street, Wilkes-Barre, Pennsylvania 18711. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check [www.WUDataSettlement.com](http://www.WUDataSettlement.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 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 Application for Attorneys' Fees, Costs, and Service Awards.

#### **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.

#### **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. 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 benefits from the Settlement, you will not be able to sue for the claims in this Action, and you will release the claims against Defendant and Released Parties described in Question 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, the Application for Attorneys' Fees, Costs, and Service Awards, and more, please visit [www.WUDataSettlement.com](http://www.WUDataSettlement.com) or call 1-866-742-4955. You may also contact the Settlement Administrator at Wilkes University Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

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