

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Machado v. CR&R Incorporated
Case No. 30-2025-01450762-CU-NP-CXC
Superior Court of Orange County, California

**IF YOU PREVIOUSLY RECEIVED A NOTICE ABOUT THE DECEMBER 2022
CR&R DATA BREACH,
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,
AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

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

You are not being sued.

Please read this notice carefully and completely.

- A settlement has been reached with CR&R Incorporated (“CR&R” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on CR&R's computer systems that occurred on or about December 13, 2022 (“Data Incident”). Certain files that contained private information were accessed. These files may have contained personal information such as names, Social Security numbers, financial account information, and health insurance information.
- The lawsuit is called *Machado v. CR&R Incorporated*, Case No. 30-2025-01450762-CU-NP-CXC. It is pending in the Superior Court of Orange County, California (“Action”).
- CR&R denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (“Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Action.
- CR&R's records indicate that you are a member of the proposed settlement class (“Settlement Class”), and entitled to benefits under the Settlement. You may have received a previous notice directly from CR&R.
- Your rights are affected whether you act or don't act. ***Please read this notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.CRRDataSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	August 24, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	August 8, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt-out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement and/or by orally objecting or otherwise offering comments about the Settlement at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	August 8, 2026
DO NOTHING	Unless you opt-out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

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Basic Information

1. Why was this notice issued?

The Superior Court of Orange County, California, authorized this notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Machado v. CR&R Incorporated*, Case No. 30-2025-01450762-CU-NP-CXC. It is pending in the Superior Court of Orange County, California. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, CR&R Incorporated, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the December 13, 2022, targeted cyberattack on CR&R's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names, Social Security numbers, financial account information, and health insurance information.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are members of the “Settlement Class.” One court resolves the lawsuit for all Settlement Class members, except for those who opt-out from the Settlement. In this Settlement, the Class Representative is Eric Machado, and everyone included in this Action are the Settlement Class members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant is right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class members to receive benefits from the Settlement. The Plaintiff and his attorneys think the Settlement is best for all Settlement Class members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Court has defined the Settlement Class this way: “All living individuals residing in the United States who were sent a notice of the Data Incident indicating their Private Information may have been impacted in the Data Incident.”

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) all persons who are directors, officers, and agents of CR&R, or their respective subsidiaries and affiliated companies; (2) governmental entities; and (3) the Judge assigned to the Action, that Judge’s immediate family, and Court staff.

If you are not sure whether you are a Settlement Class member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@CRRDataSettlement.com
- Call toll free, 24/7: 1-833-386-6553
- By mail: CR&R Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You may also view the Settlement Agreement at www.CRRDataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

CR&R will establish a Settlement Fund of \$500,000.00. The Settlement Fund will first be used to pay court-approved attorneys’ fees (up to \$150,000.00) and costs (up to \$2,000.00), a service award for the Plaintiff (up to \$3,000.00), and the costs of administering the Settlement (not to exceed \$45,000.00). The rest of the Settlement Fund will be used to pay for Settlement Class Member Benefits.

All Settlement Class members may enroll in **Credit Monitoring Services** and select one of two **Cash Payment** options. These benefits are explained below.

CREDIT MONITORING SERVICES

All Settlement Class members may enroll in two years of credit monitoring by the three credit bureaus.

CASH PAYMENT OPTIONS

Cash Payment A - Documented Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you can get back up to **\$5,000.00**. The losses must have occurred between December 13, 2022, and August 24, 2026.

This benefit covers out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit
- cost to replace your IDs

- postage to contact banks by mail

You will not be reimbursed for these expenses if you have been reimbursed for the same expenses by another source.

You need to send proof, like bank statements or receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim.

Cash Payment B – Alternate Cash. Instead of the benefits in Option A, you may claim a one-time cash payment. This payment is expected to be approximately **\$150.00**, but may be smaller or larger depending on the number of claims that are filed. You do not have to provide any proof or explanation to claim this payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@CRRDataSettlement.com
- Call toll free, 24/7: 1-833-386-6553
- By mail: CR&R Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

8. What claims am I releasing if I stay in the Settlement Class?

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against CR&R about the issues this Settlement covers. The "Releases" section of the Settlement Agreement (Section XIII) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.CRRDataSettlement.com.

Submitting a Claim Form for a Settlement Benefit

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.CRRDataSettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

CR&R Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-386-6553, by email info@CRRDataSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **August 24, 2026**. If you are submitting a Claim Form by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **August 24, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on **September 14, 2026** (see **Question 18**). If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court appointed attorneys Jeff Ostrow and Kristen Lake Cardoso of Kopelowitz Ostrow P.A. to represent you and other Settlement Class members (“Class Counsel”).

13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the Court to award attorneys’ fees of up to 30% of the Settlement Fund (i.e., \$150,000.00), plus reimbursement of costs of up to \$2,000.00, which will be paid from the Settlement Fund.

Class Counsel will also ask the Court to award the Class Representative up to \$3,000.00 (“Service Award”) in recognition of the time and effort he expended in pursuing this Action and in fulfilling his obligations and responsibilities as Class Representative, which will also be paid from the Settlement Fund.

Opting Out of the Settlement

15. How do I opt-out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from, or “opt-out” of, the Settlement. If you opt-out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue CR&R on your own about the legal issues in this case.

If you opt-out of the Settlement, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you opt-out.

The deadline to opt-out of the Settlement is **August 8, 2026**.

To opt-out, you may check the box on the Postcard Notice stating that you wish to opt-out of the Settlement and mail it to Settlement Administrator or you may visit the Settlement Website, www.CRRDataSettlement.com, to submit your opt-out request online. You may only exclude yourself—not any other person.

Your request to opt-out must be submitted or postmarked by **August 8, 2026**.

Commenting on or Objecting to the Settlement

16. How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class member and do not like part of or all of the Settlement, you can object to it. Objecting means telling the Court why you think the Court should not approve the Settlement. The Court will consider your views. You may object in writing pursuant to the instructions below, or you may orally object or otherwise offer comments about the Settlement at the Final Approval Hearing.

You cannot object if you have opted out of the Settlement (**see Question 15**).

You may submit a written objection, which must provide the following information:

- (1) the name of the Action: *Machado v. CR&R Incorporated*, Case No. 30-2025-01450762-CU-NP-CXC, pending in the Superior Court of Orange County, California;
- (2) your full name, mailing address, telephone number, and email address;
- (3) all grounds for the objection, accompanied by any legal support for the objection;
- (4) the identity of all counsel who represent you, including any former or current counsel who may be entitled to compensation for any reason related to your objection;
- (5) the identity of all counsel (if any) representing you, and whether they will appear at the final approval hearing;
- (6) a list of all persons who will be called to testify at the final approval hearing in support of the objection (if any);
- (7) a statement confirming whether you intend to personally appear and/or testify at the final approval hearing; and
- (8) your signature (if you have hired your own lawyer, your lawyer's signature is **not** sufficient).

For your written objection to be valid, it must meet each of these requirements.

For your written objection to be considered by the Court, you must mail it to the Settlement Administrator, at the address below:

CR&R Data Incident Settlement
ATTN: Objections
P.O. Box 25226
Santa Ana, CA 92799-9958

17. What is the difference between objecting and opting out?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not opt-out of the Settlement. Opting out is excluding yourself from the Settlement and stating to the Court that you do not want to be part of the Settlement. If you opt-out of the Settlement, you cannot object to it because the Settlement no longer affects you.

The Court's Final Approval Hearing

18. When is the Court's Final Approval Hearing?

The Court will hold a Final Approval Hearing on **September 14, 2026 at 1:30 p.m. Pacific Time**, in Division CX103 of the Superior Court of Orange County, California, at the Civil Complex Center, 751 W. Santa Ana Blvd., Santa Ana, CA 92701 ("Final Approval Hearing").

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide how Class Counsel should be paid, and whether to award a Service Award to the Class Representative. The Court will also consider any objections to the Settlement.

If you are a Settlement Class member, you or your lawyer may ask permission to speak at the Final Approval Hearing at your own cost (**See Question 16**).

The date and time of the Final Approval Hearing may change without further notice. Please check www.CRRDataSettlement.com for updates.

19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement. You will also give up the rights described in **Question 8**.

Getting More Information

21. How do I get more information?

This notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.CRRDataSettlement.com.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@CRRDataSettlement.com
- Call toll free, 24/7: 1-833-386-6553
- By mail: CR&R Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799-9958.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Civil Complex Center, 751 W. Santa Ana Blvd., Santa Ana, CA 92701.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT