

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Kaplan v. Crimson Wine Group, Ltd.
Case No. 25CV001571
Superior Court of California, County of Napa

IF CRIMSON WINE GROUP, LTD. NOTIFIED YOU THAT YOUR PRIVATE INFORMATION WAS INVOLVED IN A JANUARY 2024 DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS AND ENTITLE YOU TO A BENEFIT.

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 Crimson Wine Group, Ltd., (“CWG” or “Defendant”) in a class action lawsuit. This class action lawsuit concerned the targeted cyberattack on CWG's computer systems that occurred in or about June 2024 (the “Data Incident”). Certain files that contained Private Information were accessed. These files may have contained personal information such as names, Social Security numbers, and financial account information.
- The lawsuit is captioned *Kaplan v. Crimson Wine Group, Ltd.*, Case No. 25CV001571, pending in the Superior Court of California for the County of Napa (the “Action”).
- CWG denies that it did anything wrong, and the Court has not decided who is right.
- The Parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the litigation.
- CWG’s records indicate that you are a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from CWG.
- 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.CrimsonWineSettlement.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.	September 1, 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 3, 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. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a Claim for Settlement Class Member Benefits.	August 3, 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 California for the County of Napa authorized this Notice. You have a right to know about the proposed Settlement of this Action, 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 captioned *Kaplan v. Crimson Wine Group, Ltd.*, No. 25CV001571, Superior Court of California, County of Napa. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the entity they sued Crimson Wine Group, Ltd., the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that during the June 2024 targeted cyberattack on CWG's computer systems, certain files that contained Private Information were accessed. These files may have contained personal information such as names, Social Security numbers, and financial account information.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. This individual is called the “Plaintiff” or “Class Representative.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt-out of the settlement. In this Settlement, the Class Representative is Joanne Kaplan. Everyone else included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff is right, 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. Plaintiff and Class Counsel 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 as: “all individuals residing in the United States whose Private Information was accessed and/or acquired by an unauthorized party as a result of the data breach reported by Defendant in June 2024.”

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (a) directors and officers of Defendant; (b) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and (c) natural persons who properly execute and submit a Request for Exclusion prior to the expiration of the Opt-Out Period.

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

- Email: info@CrimsonWineSettlement.com
- Call toll free, 24/7: 1- (833) 386-6523
- By mail: CWG Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799

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

The Settlement Benefits

7. What does the Settlement provide?

CWG will establish a Settlement Fund of \$637,500.00. The Settlement Fund will first be used to pay court-approved attorneys’ fees and costs, Service Award for the Plaintiff, and Settlement Administration Costs. The net remaining funds will be used to pay for the Settlement Class Member Benefits described below.

You may Claim Credit Monitoring Services and **either** Cash Payment A **or** Cash Payment B.

CREDIT MONITORING SERVICES. All Settlement Class Members are eligible to receive 2 years of Credit Monitoring Services. This includes:

- (1) real time monitoring of the Settlement Class Member’s credit file at a credit bureau;
- (2) dark web scanning with immediate notification of potential misuse;
- (3) comprehensive public record monitoring;
- (4) identity theft insurance with no deductible; and
- (5) access to fraud resolution agents to help investigate and resolves instances of theft

CASH PAYMENTS. All Settlement Class Members are eligible for a Cash Payment. You may select **only one** Cash Payment, **not both**.

Cash Payment A – Documented Losses. If you incurred actual, **documented** out-of-pocket losses due to the Data Incident, you may file a Claim for reimbursement. The maximum amount of this reimbursement is \$5,000.00.

This benefit covers expenses like:

- (1) bank, credit card, and debit card fees;
- (2) overdraft, declined payment, and returned check fees;
- (3) cost to replace your driver's license, Social Security number, or other types of identification;
- (4) long distance phone charges, cell phone charges (if charged by the minute), or data charges (if charged by the amount of data used);
- (5) fees for credit reports or credit monitoring; and
- (6) losses due to identity theft or fraud

You must submit third-party documentation, such as receipts, to verify the costs you incurred. You may submit "self-prepared" documents to clarify or support other submitted documentation, but ***self-prepared documents by themselves are not sufficient*** to file a Valid Claim.

If you Claim Cash Payment A, you may **not** also Claim Cash Payment B.

Cash Payment B – Pro Rata Undocumented Cash Payment. In lieu of submitting a Claim for Documented Losses, you may request a one-time *pro rata* cash payment estimated to be \$100.00, subject to *pro rata* increase or decrease depending on the number of Valid Claims submitted.

If you Claim Cash Payment B, you may **not** also Claim Cash Payment A.

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

- Email: info@CrimsonWineSettlement.com
- Call toll free, 24/7: 1- (833) 386-6523
- By mail: CWG Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799

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

Unless you opt-out of the Settlement, you won't be able to sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The "Release" section of the Settlement Agreement (Section XIII) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.CrimsonWineSettlement.com.

Submitting a Claim Form for a Settlement Class Member Benefit

9. How do I submit a claim for a Settlement Class Member Benefit?

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

CWG Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free,

1- (833) 386-6523, by email info@CrimsonWineSettlement.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 **September 1, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **September 1, 2026**.

11. When will the Settlement Class Member Benefits be issued?

The Court will hold a Final Approval Hearing on **October 13, 2026 @ 8:30am (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 Class Member Benefits 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 Catherine Ybarra and Neil Williams of Siri & Glimstad LLP, and Jessica A. Wilkes of Federman & Sherwood to represent you and the 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 approve attorneys' fees of up to 35% of the monetary and non-monetary Settlement benefits procured for the Settlement Class – which includes the Settlement Fund and the value of the data security enhancements implemented by Defendant, as set forth in Section XI of the Settlement Agreement – plus reimbursement, plus reimbursement of reasonable costs, which will be paid from the Settlement Fund.

Class Counsel will also ask for a Service Award of \$3,000.00 for the Class Representative. The Service Award will be paid from the Settlement Fund.

Excluding Yourself from 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 the Settlement. This is called a request for exclusion or "opting-out."

If you exclude yourself or opt-out, 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 Class Member Benefits if you exclude yourself, but you will keep any rights you may have to sue CWG on your own about the legal issues in this case.

The deadline to exclude yourself or opt-out from the Settlement is **August 3, 2026**.

To be valid, your opt-out request must have the following information:

- (1) the name of the Action: *Kaplan v. Crimson Wine Group, Ltd.*, 25CV001571., Superior Court of California, County of Napa;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) your personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you want to be excluded from the Settlement.

You may only exclude yourself—not any other person.

Mail your opt-out request to the Settlement Administrator at:

CWG Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799

Your opt-out request must be postmarked by **August 3, 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 or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**).

If you submit a written objection, please provide the following information::

- (1) the name of the Action: *Kaplan v. Crimson Wine Group, Ltd.*, No. 25CV001571, Superior Court of California, County of Napa;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) a clear description of all the reasons you object, including any legal support you may have for your objection;
- (4) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and contact information, and indicate if they will appear at the Final Approval Hearing;
- (5) a full list of all witness you plan to call and documents you plan to submit at the Final Approval Hearing;
- (6) a statement confirming whether you intend to personally appear or testify at the Final Approval Hearing; and
- (7) your signature (if you have hired your own lawyer, your lawyer’s signature is *not* sufficient).

For your objection to be valid, it must meet each of these requirements. Your objection request must be postmarked by **August 3, 2026**.

Please submit any written objections to the Clerk of the Court, Class Counsel, and Counsel for Defendant.

Clerk of the Court	Class Counsel	Counsel for Defendants
Clerk of the Court Napa County Superior Court 1111 3rd St. Napa, CA 94559	Neil Williams Catherine Ybarra Siri & Glimstad, LLP 745 Fifth Avenue, Suite 500 New York, New York 10151 Jessica A. Wilkes Federman & Sherwood 10205 N Pennsylvania Ave Oklahoma City, OK 73120	Fredrick A. Hagen Freeman Mathis & Gary, LLP 1850 Mt. Diablo Blvd. Suite 510 Walnut Creek, CA 94596 Fred.hagen@fmglaw.com

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 exclude yourself or opt-out from the Settlement. Excluding yourself from the Settlement is opting-out 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 **October 13, 2026 @ 8:30am Pacific Time**, in Department B of the Napa County Superior Court, 1111 3rd St., Napa, CA 94559 and via Zoom (instructions below):

<https://www.zoomgov.com/j/1618700612?pwd=3bjaxoPtIUWe7B7JOWBO8muwsuMIXC..1>

Join by Phone: 833-568-8864 or 833-435-1820 **Meeting ID:** 161 870 0612 **Password:** 776773

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 who brought this Action on behalf of the Class. 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 hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check www.CrimsonWineSettlement.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.CrimsonWineSettlement.com**.

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

- Email: info@CrimsonWineSettlement.com
- Call toll free, 24/7: 1- (833) 386-6523
- By mail: CWG Data Incident Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Napa County Superior Court, 1111 3rd St., Napa, CA 94559.

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