

## NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

### **If Your Private Information Was Potentially Compromised in a Data Incident Announced by the Pennsylvania State Education Association on March 18, 2025, You May be Eligible for Benefits From a Class Action Settlement.**

*A court authorized this Notice. This is not a solicitation from a lawyer, junk mail, or an advertisement.*

- A proposed Settlement has been reached in a class action lawsuit known as *Melanie Hudson, et al. v. Pennsylvania State Education Association*, Case No. 2025-CV-02411 (the “Action”), filed in the Court of Common Pleas of Dauphin County, Pennsylvania.
- The Action arises out of unauthorized access to the Pennsylvania State Education Association (“PSEA” or “Defendant”) systems and certain files containing sensitive and/or personal information (collectively “Private Information”) that occurred on or around July 6, 2024, and that was announced by Defendant on or about March 18, 2025 (the “Data Incident”). The Plaintiffs allege that the Data Incident was a result of Defendant’s failure to use reasonable data-security measures. Defendant denies Plaintiffs’ claims, and further denies any wrongdoing or liability.
- All Settlement Class Members who submit a Valid Claim can receive the following benefits from the Settlement: two years of credit monitoring, plus either (1) up to \$5,000 for documented Out-of-Pocket Losses, or (2) an Alternative Cash Payment of \$50, the amount of which is subject to proration based on the number of Valid Claims received.
- You are included in the Settlement if your Private Information was potentially compromised as a result of the Data Incident, including if you received a notification from PSEA that your information may have been compromised.
- 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>	<b>You must submit a Valid Claim to get money from this Settlement.</b> Claim Forms must be submitted online by <b>July 6, 2026</b> , if mailed, postmarked no later than <b>July 6, 2026</b> .
<b>Exclude Yourself</b>	<b>Get out of the Settlement. Get no money. Keep your rights.</b> This is the only option that allows you to keep your right to sue as to the claims in this lawsuit. You will not get any money from the Settlement. Your request to exclude yourself must be received no later than <b>July 6, 2026</b> .
<b>File an Objection</b>	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than <b>July 6, 2026</b> .
<b>Go to a Hearing</b>	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. The Final Approval Hearing is scheduled for <b>July 27, 2026</b> .

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## BASIC INFORMATION

### 1. How do I know if I am affected by the Lawsuit and Settlement?

You are a Settlement Class Member if your Private Information was potentially compromised as a result of the Data Incident occurring on or around July 6, 2024, and announced by Defendant on or around March 18, 2025.

Excluded from the Settlement Class are (a) all persons who are governing board members of the Defendant; (b) governmental entities; and (c) the Court and any Judge(s) presiding over this matter, the Court's immediate family, and Court staff. This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

### 2. What is the Action about?

The Action is known as *Melanie Hudson, et al. v. Pennsylvania State Education Association*, Case No. 2025-CV-02411, filed in the Court of Common Pleas of Dauphin County, Pennsylvania. The persons who sued are the "Plaintiffs," and the entity they sued, Pennsylvania State Education Association, is known as the "Defendant." Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of anyone else whose Private Information was potentially impacted as a result of the Data Incident.

This Action arises out of unauthorized access to Defendant's systems and certain files containing sensitive and/or personal information that occurred on or around July 6, 2024, and that was announced by Defendant on or about March 18, 2025. Subsequently, Plaintiffs filed this Action, asserting claims against Defendant relating to the Data Incident. Defendant denies Plaintiffs' claims and denies 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 the Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at [www.PSEADataSettlement.com](http://www.PSEADataSettlement.com).

### 4. Why is this a class action?

In a class action, one or more people called "Class Representatives" (Plaintiffs) 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 if your Private Information was potentially compromised as a result of 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.PSEADataSettlement.com](http://www.PSEADataSettlement.com), call toll-free 1-800-465-8066, send email to [PSEADataSettlement@RG2claims.com](mailto:PSEADataSettlement@RG2claims.com), or write to PSEA Data Settlement, c/o RG2 Claims Administration, P.O. Box 59479, Philadelphia, PA 19102-9479.

## THE SETTLEMENT BENEFITS

### 6. What does this Settlement provide?

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

**Cash Payment for Out-of-Pocket Losses:** All Settlement Class Members who submit a Valid Claim using the Claim Form are eligible for a Cash Payment for Out-of-Pocket Losses, not to exceed \$5,000 per Settlement Class Member, that were incurred as a result of and are fairly traceable to the Data Incident upon presentment of documentation evidencing such losses. Out-of-Pocket Losses may include, without limitation: (1) unreimbursed costs, expenses, losses, or charges incurred on or after July 6, 2024, as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of a Settlement Class Member's Private Information; (2) costs incurred on or after July 6, 2024, associated with purchasing, accessing, or freezing/unfreezing credit reports with any credit reporting agency; (3) other miscellaneous expenses incurred related to any Out-of-Pocket Loss, such as notary, fax, postage, copying, mileage, internet usage charges (if either charged by the minute or incurred solely as a result of the Data Incident), and long-distance telephone charges and cellphone minutes (if charged by the minute); and (4) credit monitoring, fraud resolution, or other mitigative services or costs that were incurred on or after July 6, 2024, through and March 18, 2026. To receive reimbursement for any of the above-referenced out-of-pocket losses, Settlement Class Members must submit a valid and timely claim form, including necessary supporting documentation, to the Settlement Administrator.

**Alternative Cash Payment:** In the alternative to a Cash Payment for Out-of-Pocket Losses, Settlement Class Members may submit a claim for a cash payment in the amount of \$50, which is subject to proration based upon the number of Valid Claims filed. Settlement Class Members do not need to submit supporting documentation to claim an Alternative Cash Payment. *(You cannot file a claim for Out-of-Pocket Expenses if you claim the Alternative Cash Payment.)*

**Credit Monitoring:** In addition to electing either of the other benefits, Settlement Class Members may claim two years of credit monitoring that will provide proactive credit monitoring, access to credit report(s), and identity theft insurance.

### 7. How do I submit a claim?

All claims will be reviewed by the Settlement Administrator. You must file a Valid Claim Form to get any money from the proposed Settlement. Claim Forms must be submitted online or postmarked no later than **July 6, 2026**. You can download a Claim Form at [www.PSEADataSettlement.com](http://www.PSEADataSettlement.com), send email to

**PSEADataSettlement@RG2claims.com**, or you can call the Settlement Administrator at 1-800-465-8066. The unique Class Member ID and PIN on the Notice you received will be required to access the online and paper claim forms.

### **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 other Released Parties, as defined in the Settlement Agreement. The Settlement Agreement, which includes all provisions regarding settled claims, releases, and Released Parties, is available at [www.PSEADataSettlement.com](http://www.PSEADataSettlement.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 will give up the right to sue for the claims in this case.

### **9. Will the Class Representative receive compensation?**

Yes. The Class Representatives will apply for and, if approved by the Court, each receive a Service Award of \$1,500 to compensate them for their services and efforts in bringing the Action. Plaintiffs who were involved in earlier stages of the Action but not included as Class Representatives, i.e., Plaintiffs who filed individual cases but were not included in the Complaint, will apply for and, if approved by the Court, each receive a Service Award of \$500. The Court will make the final decision as to the amounts, if any, to be paid to the Class Representatives and other Plaintiffs.

### **EXCLUDE YOURSELF**

### **10. How do I exclude myself from the Settlement?**

You can ask to be excluded from the Settlement. The opt-out or exclusion request must be in writing and must identify the case name, "*Hudson, et al. v. Pennsylvania State Education Association*," be personally signed by you, and contain your name, address, telephone number, and email address (if any), and unique identifier; identify any lawyer representing you; and must include a statement indicating a request to be excluded from the Settlement Class. You must mail your exclusion request, postmarked no later than **July 6, 2026** to the following address:

PSEA Data Settlement  
c/o RG/2 Claims Administration  
P.O. Box 59479  
Philadelphia, PA 19102-9479  
[PSEADataSettlement@rg2claims.com](mailto:PSEADataSettlement@rg2claims.com)

You cannot exclude yourself by phone. Any individual who wants to be excluded from the Settlement must submit his or her own exclusion request. No mass or group opt-outs shall be permitted.

If you exclude yourself, you will not be able to receive any cash 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. Unless you exclude yourself, you give up any right to sue Defendant and the Released Parties for the claims or legal issues released in this Settlement, even if you do nothing.

## **12. What happens if I do nothing at all?**

If you do nothing, you will receive no benefits under the Settlement. You will be in the Settlement Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court, and the Settlement, including its Release.

### **THE LAWYERS REPRESENTING YOU**

## **13. Do I have a lawyer in the case?**

Yes. The Court has appointed Gerald D. Wells, III of the law firm LYNCH CARPENTER LLP and Bart D. Cohen of the law firm BAILEY & GLASSER LLP (called “Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for the services of 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 and Costs in an amount not to exceed \$833,333.33. A copy of Class Counsel’s Application for Attorneys’ Fees, Costs, and Service Awards will be posted on the Settlement Website, [www.PSEADataSettlement.com](http://www.PSEADataSettlement.com), before the Final Fairness Hearing. The Court will make the final decisions as to the amount 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. For an objection to be considered by the Court, the objection must be submitted no later than the last day of the Objection Deadline, as specified in the Notice. If submitted by mail, an objection shall be deemed to have been submitted when posted if received with a postmark date indicated on the envelope and if mailed first-class postage prepaid and addressed in accordance with the instructions. If submitted by private courier (e.g., Federal Express), an objection shall be deemed to have been submitted on the shipping date reflected on the shipping label. The objection must also set forth:

- (i) your full name, address, telephone number, and e-mail address (if any);
- (ii) all grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
- (iii) the number of times you have objected to a class action settlement within the five years preceding the date that you filed the objection, the caption of each case in which you made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- (iv) 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 the objection to the Settlement and/or Application for Attorneys’ Fees, Costs, and Service Awards;

- (v) the number of times in which your 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;
- (vi) any and all agreements that relate to the objection or the process of objecting—whether written or oral—between you or your counsel and any other person or entity;
- (vii) the identity of all counsel (if any) representing you who will appear at the Final Approval Hearing;
- (viii) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (ix) a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- (x) your signature (an attorney’s signature is not sufficient).

Your objection must include the case name and docket number, *Melanie Hudson, et al. v. Pennsylvania State Education Association*, Case No. 2025-CV-02411, and be submitted to the Clerk of the Court, Class Counsel, Defendant’s Counsel, and the Settlement Administrator, as follows:

CLERK OF THE COURT	CLASS COUNSEL	DEFENSE COUNSEL	SETTLEMENT ADMINISTRATOR
Clerk of the Court Dauphin County Courthouse 101 Market Street Harrisburg, PA 17101	LYNCH CARPENTER, LLP Attn: Gerald D. Wells, III 1760 Market Street Suite 600 Philadelphia, PA 19103  BAILEY & GLASSER, LLP Attn: Bart D. Cohen 1055 Thomas Jefferson St. NW Suite 540 Washington, D.C. 20007	McDONALD HOPKINS Attn: Christopher G. Dean 600 Superior Ave E Cleveland, OH 4414	PSEA Data Settlement c/o RG/2 Claims Administration P.O. Box 59479, Philadelphia, PA 19102-9479

If you do not submit your objection with all requirements, 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 FAIRNESS HEARING**

**17. When and where will the Court decide whether to approve the Settlement?**

The Court will hold the Final Approval Hearing on July 27, 2026 at 9:30 a.m. ET at the Court of Common Pleas of Dauphin County, 101 Market St., Harrisburg, PA 17101. The hearing may be moved to a different

date, time, or location without additional notice, so it is recommended that you periodically check [www.PSEADataSettlement.com](http://www.PSEADataSettlement.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 to Class Counsel and 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.

### **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 money from the Settlement, you will not be able to sue for the claims in this case, and you will release the claims against Defendant and the other Released Parties.

## **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 lawsuit, 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 and more, please visit [www.PSEADataSettlement.com](http://www.PSEADataSettlement.com) or call 1-800-465-8066. You may also contact the Settlement Administrator at PSEA Data Settlement, c/o RG2 Claims Administration, P.O. Box 59479, Philadelphia, PA 19102-9479 or via email at [PSEADataSettlement@RG2claims.com](mailto:PSEADataSettlement@RG2claims.com).

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