NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Lehrbach v. EMM Loans, LLC
Case No. 1:25-cv-02040
District Court of New Jersey

IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE FEBRUARY 2024 EMM LOANS, LLC, DATA INCIDENT, 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 EMM Loans, LLC ("EMM Loans" or "Defendant") in a class action lawsuit. This case is about the targeted cyberattack on EMM Loans' computer systems that occurred in February 2024 (the "Data Incident"). Certain files that contained private information were accessed. These files may have contained personal information such as names; Social Security number; driver's license or other state identification number; and/or passport number.
- The lawsuit is called *Lehrbach v. EMM Loans, LLC*, Case No. 1:25-cv-02040. It is pending in the District Court of New Jersey (the "Litigation").
- EMM Loans 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.
- EMM Loans' records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from EMM Loans.
- 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 or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at https://EMMLoansDataSettlement.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 17, 2026**
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no benefit or payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	**July 17, 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 benefits.	**July 17, 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 or payments 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.

WHAT THIS NOTICE CONTAINS

Basic Information

1. Why was this Notice issued?

The District Court of New Jersey, 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 *Lehrbach v. EMM Loans, LLC*, Case No. 1:25-cv-02040. It is pending in the District Court of New Jersey. The person that filed this lawsuit is called the "Plaintiff" (or "Class Representative") and the company they sued, EMM Loans, LLC, is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that during the February 2024 targeted cyberattack on EMM Loans' computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names; Social Security number; driver's license or other state identification number; and/or passport number.

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 called a "Class" or "Class Members." One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representative is Linda Lehrbach. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

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

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Class this way: "All individuals residing in the United States whose PII was implicated in the Incident discovered by EMM in February 2024, including all those individuals who received notice of the breach." In this sentence, PII means Personally Identifiable Information.

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) EMM and its officers, directors, and related companies; (2) the Judge in this case, and the Judge's family and staff; and (3) anyone who validly excludes themselves from the Settlement.

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

- Email: info@EMMLoansDataSettlement.com
- Call toll free, 24/7: (833) 386-6557
- By mail:

EMM Loans Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at https://EMMLoansDataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

All Settlement Class Members may elect **Credit Monitoring Services** in addition to **either** (a) reimbursement for **Unreimbursed Economic Losses** (which includes Out-of-Pocket Losses and Lost Time), **or** (b) an **Alternative Cash Payment**.

CREDIT MONITORING. All Class Members are eligible to enroll in two years of CyEx Financial Shield Complete. This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

If anything, suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH BENEFITS OPTIONS. In addition to Credit Monitoring, Settlement Class Members may elect **one (1)** of the following:

1. **Unreimbursed Economic Losses (Up to $4,000).** You may submit a claim for reimbursement of Unreimbursed Economic Losses incurred as a result of the Data Incident, up to $4,000 per person.

   Unreimbursed Economic Losses include **Out-of-Pocket Losses and Lost Time**.

   Out-of-Pocket Losses. If you incurred actual, documented out-of-pocket losses due to the Data Incident, you may be reimbursed. These are expenses that are fairly traceable to the Incident and were not reimbursed by any third party. This may include expenses such as:

   - 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

   To receive reimbursement, you must provide supporting documentation, such as receipts, bank statements, or invoices, showing the amount of your loss and that it is related to the Data Incident. Notes or self-prepared documents may help explain your claim but are not sufficient on their own.

   You cannot be reimbursed for expenses that have already been paid or reimbursed by a third party.

   Lost Time. You may also claim compensation for time spent dealing with the Data Incident, at $30 per hour for up to three (3) hours (maximum $90). You do not need documentation for Lost Time, but you must attest that the time was actually spent responding to the Incident.

2. **Alternative Cash Payment.** Instead of seeking reimbursement for Unreimbursed Economic Losses (including Out-of-Pocket Losses and Lost Time), you may claim a one-time Alternative Cash Payment of $50.00.

   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@EMMLoansDataSettlement.com
- Call toll free, 24/7: (833) 386-6557
- By mail:

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

If you stay in the class, you won't be able to be part of any other lawsuit against EMM Loans about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at https://EMMLoansDataSettlement.com.

Submitting a Claim Form for a Settlement Payment

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

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

EMM Loans 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, (833) 386-6557, by email info@EMMLoansDataSettlement.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 17, 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 August 17, 2026.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on August 24, 2026, at 10:00 a.m., (***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 has appointed attorney Cassandra Miller of Strauss Borrelli PLLC, to represent you and other 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 $125,000.00 as reasonable attorney's fees and costs of litigation. This amount will be paid by EMM Loans.

Class Counsel will also ask for a Service Award Payment of $5,000.00 for the Class Representative. The Service Award Payment will also be paid by EMM Loans.

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 and is sometimes also called "opting out." If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue EMM Loans on your own about the legal issues in this case.

If you exclude yourself, 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 exclude yourself.

The deadline to exclude yourself from the Settlement is **July 17, 2026.**

To be valid, your Request for Exclusion must have the following information:

(1) the name of the Litigation: *Lehrbach v. EMM Loans, LLC*, Case No. 1:25-cv-02040, pending in the District Court of New Jersey;

(2) your full name, mailing address, telephone number, and email address;

(3) personal signature; and

(4) the words "Request for Exclusion" or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

EMM Loans Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted or postmarked by **July 17, 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 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**)

You must provide the following information for the Court to consider your objection:

(1) the name of the Litigation: *Lehrbach v. EMM Loans, LLC*, Case No. 1:25-cv-02040, pending in the District Court of New Jersey;

(2) your full name, mailing address, telephone number, and email address;

(3) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;

(4) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;

(5) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;

(6) your signature (or, if you have hired your own lawyer, your lawyer's signature).

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

To be considered by the Court, you must file your complete objection with the Clerk of Court by **July 17, 2026**. You must also send a copy of the objection to the Settlement Administrator.

Clerk of the Court	Settlement Administrator
Clerk of the Court Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets Room 1050, Camden, NJ 08101.	EMM Loans Data Incident Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

17. What is the difference between objecting and excluding?

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 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 **August 24, 2026, at 10:00 a.m., Eastern Time**, in Room 5C of the District Court of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101.

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 Payment to the Class Representative. The Court will also consider any objections to the Settlement.

If you are a 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 https://EMMLoansDataSettlement.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.

Unless you exclude yourself, you will be bound by the Settlement and the Release, regardless of whether you submit a claim or receive any benefits.

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, https://EMMLoansDataSettlement.com.

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

- Email: info@EMMLoansDataSettlement.com
- Call toll free, 24/7: (833) 386-6557
- By mail:

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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, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets Room 1050, Camden, NJ 08101.

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