

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Pauley, et al. v. Endue, Inc. d/b/a Endue Software*  
Case No. CACE-25-015155  
17<sup>th</sup> Judicial Circuit in and for Broward County, Florida

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE FEBRUARY 2025 ENDUE SOFTWARE DATA INCIDENT, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO MEDICAL DATA AND CREDIT MONITORING 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 Endue, Inc. d/b/a Endue Software (“Endue” or “Defendant”) in a class action lawsuit. This case is about a targeted cyberattack on Endue's computer systems that occurred in February 2025 (“Data Incident”). Certain files that contained Private Information were accessed.
- The lawsuit is called *Pauley, et al. v. Endue, Inc. d/b/a Endue Software*, Case No. CACE-25-015155. It is pending in the 17<sup>th</sup> Judicial Circuit in and for Broward County, Florida (“Action”).
- Endue denies that it did anything wrong, and the Court has not decided who is right.
- The Parties have agreed to settle the Action (“Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing litigation.
- Endue'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 Endue.
- Your rights are affected whether you act or do not act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>SUBMIT A CLAIM</b>	<p>The only way to receive Medical Data and Credit Monitoring and/or a Cash Payment from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <b>www.EndueSoftwareDataSettlement.com</b>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.</p>	<b>June 30, 2026</b>
<b>OPT-OUT OF THE SETTLEMENT</b>	<p>You can choose to opt-out of the Settlement Class, and you will not receive Medical Data and Credit Monitoring or a Cash 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.</p>	<b>June 30, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	<p>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 can still file a Claim for Medical Data and Credit Monitoring and/or a Cash Payment.</p>	<b>June 30, 2026</b>
<b>DO NOTHING</b>	<p>Unless you opt-out of the Settlement Class, you are automatically part of the Settlement. If you do nothing, you will not receive Medical Data and Credit Monitoring or a Cash Payment from this Settlement. 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 and released by this Settlement.</p>	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 17<sup>th</sup> Judicial Circuit Court in and for Broward County, Florida, 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 *Pauley, et al. v. Endue, Inc. d/b/a Endue Software*, Case No. CACE-25-015155. It is pending in the 17<sup>th</sup> Judicial Circuit Court in and for Broward County, Florida. The people that filed this lawsuit are called the “Plaintiffs” and the company they sued, Endue, Inc. d/b/a Endue Software, is called the “Defendant.”

### 2. What is this lawsuit about?

This lawsuit alleges that during a February 2025 targeted cyberattack on Endue's computer systems, certain files that contained Private Information were accessed.

### 3. What is a class action?

In a class action, one or more individual plaintiffs, called the “class representatives,” sue on behalf of other people with similar claims. Together, the people included in the class action are called “class members.” One court resolves the lawsuit for all class members, except for those who opt-out. In this proposed Settlement, the Class Representatives are Robert Pauley; Moira Polite; Elizabeth Healy; and Daniel Martinez, parent and natural guardian of D.M. a minor. Everyone included in this Action are the Settlement Class Members.

### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs 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 Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their 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 as: “All living individuals residing in the United States whose Private Information may have been impacted in the Data Incident.”

### 6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (a) all persons who are directors, officers, and agents of either Defendant; (b) governmental entities; (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and (d) anyone who validly excludes themselves from the Settlement.

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@EndueSoftwareDataSettlement.com](mailto:info@EndueSoftwareDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6509
- By mail: Endue Data Incident Settlement  
c/o Settlement Administrator  
PO Box 25226  
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at [www.EndueSoftwareDataSettlement.com](http://www.EndueSoftwareDataSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

All Settlement Class Members may claim **Medical Data and Credit Monitoring** and one of the following two **Cash Payment** options. The benefits are explained in more detail below.

**MEDICAL DATA AND CREDIT MONITORING.** All Settlement Class Members are eligible to enroll in two years of CyEx Medical Shield Complete. This comprehensive service comes with \$1 million of medical identity theft insurance, and includes monitoring for:

- healthcare insurance ID exposure
- Medical Record Number (MRN) exposure
- unauthorized Health Savings Account (HSA) spending

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

**CASH PAYMENTS.** Settlement Class Members may also claim one of two types of Cash Payments. Settlement Class Members who have documented losses from the Data Incident can make a Claim for a Cash Payment for Documented Losses. Alternatively, Settlement Class Members may claim an **Alternate Cash Payment**, which does not require documentation. You may claim only one type of Cash Payment.

**Cash Payment A - Documented Losses.** If you incurred actual, documented out-of-pocket losses related to fraud and/or identity theft due to the Data Incident, you can get back up to **\$2,500.00**. The losses must have occurred between February 16, 2025, and June 30, 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 need to send proof, like receipts, to show how much you spent or lost. Your personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but you may include that to provide clarification, context, or support for other submitted reasonable documentation showing that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

**-OR-**

**Cash Payment B - Alternate Cash Payment.** *Instead of* the Cash Payment for Documented Losses, you may claim a one-time **\$65.00** Alternate Cash payment. You do not have to provide any documentation to claim this Alternate Cash Payment.

There is an Alternate Cash Payments Fund of \$260,000.00 that will be paid out for Cash Payment B - Alternate Cash Payments. This means that if the total for all Alternate Cash Payment claims is over \$260,000.00, everyone's payment will be reduced *pro rata* so that the total amount is \$260,000.00. Alternatively, if the total for all Alternate Cash Payment claims is less than \$260,000.00, everyone's payment will be increased *pro rata* so that the total amount is \$260,000.00.

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

- Email: [info@EndueSoftwareDataSettlement.com](mailto:info@EndueSoftwareDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6509
- By mail: Endue Data Incident Settlement  
c/o Settlement Administrator  
PO 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 will not be able to be part of any other lawsuit against Endue 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 Settlement Class. The Settlement Agreement is available at [www.EndueSoftwareDataSettlement.com](http://www.EndueSoftwareDataSettlement.com).

## Submitting a Claim Form for a Settlement Payment

### 9. How do I submit a claim for Medical Data and Credit Monitoring and/or a Cash Payment?

The fastest way to submit your Claim Form is online at [www.EndueSoftwareDataSettlement.com](http://www.EndueSoftwareDataSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Endue Data Incident Settlement  
c/o Settlement Administrator  
PO 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) 386-6509, by email [info@EndueSoftwareDataSettlement.com](mailto:info@EndueSoftwareDataSettlement.com), or by U.S. mail at the address above.

### 10. Are there any important deadlines?

If you are submitting a Claim Form online, you must do so by **June 30, 2026**. If you are submitting a Claim Form by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked in the mail no later than **June 30, 2026**.

### 11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on July 15, 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.

Medical Data and Credit Monitoring activate codes and Cash Payments will be distributed if the Court grants Final Approval, and after any appeals are resolved.

Please be patient.

## The Lawyers Representing You

### 12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Jeff Ostrow of Kopelowitz Ostrow P.A. and A. Brooke Murphy of the Murphy Law Firm, 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 approve up to \$500,000.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by Endue.

Class Counsel will also ask for Service Award payments of \$2,500.00 for each of the Class Representatives. Service Award payments will also be paid by Endue.

## Opting-Out 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 Class. This is called an Opt-Out Request.

If you opt-out, you are telling the Court that you do not want to be part of the Settlement or the Settlement Class. You will not be eligible to receive any Settlement benefits if you opt-out. However, you will keep any rights you may have to sue Endue on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **June 30, 2026**.

To be valid, your Opt-Out Request must have the following information:

- (1) the name of the Litigation: *Pauley, et al. v. Endue, Inc. d/b/a Endue Software*, Case No. CACE-25-015155, pending in the 17<sup>th</sup> Judicial Circuit in and for Broward County, Florida;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Opt-Out Request” 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:

Endue Data Incident Settlement  
ATTN: Exclusion Request  
PO Box 25226  
Santa Ana, CA 92799-9958

Your Opt-Out Request must be submitted and postmarked by **June 30, 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 opted-out 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: *Pauley, et al. v. Endue, Inc. d/b/a Endue Software*, Case No. CACE-25-015155, pending in the 17<sup>th</sup> Judicial Circuit in and for Broward County, Florida;
- (2) your full name, mailing address, telephone number, and email address (if any);
- (3) the number of times the objector has objected to a class action settlement within the 5 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;
- (4) 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;
- (5) 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;
- (6) the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- (7) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- (8) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- (9) the objector's signature (an attorney's signature is not sufficient).

Class Counsel and Defendants' Counsel may conduct discovery on any objector or their counsel.

For your objection to be considered, 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 **June 30, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator, Class Counsel, and Defendant's Counsel.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of the Court 201 S.E. 6th Street Fort Lauderdale, FL 33301-3303	Endue Data Incident Settlement ATTN: Objections PO Box 25226 Santa Ana, CA 92799-9958

<b>Class Counsel</b>	<b>Counsel for Defendants</b>
Jeff Ostrow <b>Kopelowitz Ostrow P.A.</b> 1 West Las Olas Blvd, Ste. 500 Fort Lauderdale, FL 33301  A. Brooke Murphy	Carolyn Purwin Ryan Emmanuella Jean-Jacques <b>Mullen Coughlin LLC</b> 426 W Lancaster Avenue Devon, PA 19333

<p style="text-align: center;"><b>Murphy Law Firm</b> 4116 Will Rogers Parkway, Suite 700 Oklahoma City, OK 73108</p>
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## 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 opt-out from the Settlement. Opting out from the Settlement is 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 Final Approval Hearing on **July 15, 2026 at 9:30 a.m. Eastern Time** in Room WW-14175 of the 17<sup>th</sup> Judicial Circuit in and for Broward County, Florida, at 201 S.E. 6th Street #159, Fort Lauderdale, FL 33301-3303.

**Zoom link:** <https://17thflcourts.zoom.us/j/598494885>

**Meeting ID:** 598 494 885

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award to the Class Representatives. The Court will also consider any timely 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.EndueSoftwareDataSettlement.com](http://www.EndueSoftwareDataSettlement.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.EndueSoftwareDataSettlement.com](http://www.EndueSoftwareDataSettlement.com).

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

- Email: [info@EndueSoftwareDataSettlement.com](mailto:info@EndueSoftwareDataSettlement.com)
- Call toll free, 24/7: 1-(833) 386-6509
- By mail: Endue Data Incident Settlement  
c/o Settlement Administrator  
PO 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, 201 S.E. 6th Street, Fort Lauderdale, FL 33301-3303.

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