

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

District Court Bexar County, Texas, 438th Judicial District
Flores v. South Texas Oncology and Hematology, PLLC, Case No. 2024CI13299

Were you notified that your Private Information may have been accessible in a cybersecurity incident that South Texas Oncology and Hematology experienced in February 2024? A proposed class action settlement may affect your rights.

A Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with South Texas Oncology and Hematology, PLLC (“Defendant”) in a class action lawsuit about a cybersecurity incident that occurred on or about February 15, 2024 (“Data Incident”).
- You are included in this Settlement as a Settlement Class Member if your Private Information (e.g., name, Social Security Number, or private health information) may have been accessed and/or acquired by an unauthorized party as a result of the Data Incident.
- As a Settlement Class Member, your rights are affected whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive cash and other benefits from this Settlement is by submitting a Valid Claim. You can submit your Claim Form online at www.southtexasoncologydatasettlement.com or mail it to the Settlement Administrator. You may also call the Settlement Administrator to receive a paper copy of the Claim Form.	July 6, 2026
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement. 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 elect to retain your own legal counsel at your own expense. If you opt-out, you will not be able to receive any benefits and you will not be bound by the terms of the Settlement Agreement.	June 22, 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 Form for benefits.	June 22, 2026
DO NOTHING	If you do nothing, you will not receive any 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?

A Court authorized this Notice because 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 Action is captioned *Doris Flores et al. v. South Texas Oncology and Hematology, PLLC*, Case No. 2024CI13299 (Bexar County, TX). The people that filed this lawsuit are called the “Plaintiffs” and the company they sued, South Texas Oncology and Hematology, PLLC, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that Private Information (such as names, Social Security Numbers, and private health information) was impacted by the Data Incident that affected South Texas Oncology and Hematology, PLLC on or about February 15, 2024.

Defendant denies all of the Plaintiffs’ claims and maintains that it did not do anything wrong.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people who they allege have similar claims. These individuals who sue are known as “Class Representatives” or “Plaintiffs.” Together, after a court grants class certification, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who opt-out of the settlement. In this Settlement, the Class Representatives are Doris Flores, Teresa Pinson, Veronica Marin, Dee Vauda Russ, and Lawrence Holmes.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that it has not violated any laws. Plaintiffs and the Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim payments and other benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members, think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all living individuals whose Private Information may have been accessed and/or acquired by an unauthorized party as a result of the Data Incident.

THE SETTLEMENT BENEFITS

6. What can I get from this Settlement?

If approved by the Court, Defendant will pay, or cause to be paid, \$1,075,000 to resolve the Settlement.

There are two types of Cash Payments that are available to Settlement Class Members. Settlement Class Members may elect to receive one of the following in addition to Medical Data Monitoring:

- (1) **Cash Payment A – Documented Losses:** Reimbursement of up to \$5,000 in documented losses per person, subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims received; or
- (2) **Cash Payment B – Alternate Cash:** An estimated \$100 payment, subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims received.

In addition to Cash Payment A or Cash Payment B, you may also make a claim for Medical Data Monitoring, which consists of two years of CyEx Medical Shield Complete.

7. Tell me more about Cash Payment A – Documented Losses.

Settlement Class Members may submit a claim for a cash payment of up to \$5,000 per person for documented losses if they can show the losses are related to the Data Incident.

To receive a documented loss payment, Settlement Class Members must elect Cash Payment A on the Claim Form attesting under penalty of perjury to incurring documenting losses. Settlement Class Members will be required to submit reasonable documentation supporting the losses, such as documentation generated or prepared by a third party or the Settlement Class Member supporting a claim for expenses paid. Reasonable documentation includes telephone records, correspondence including emails, or receipts. Personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute reasonable documentation but may be included to provide clarification, context, or support for other submitted reasonable documentation. Settlement Class Members will not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including compensation provided in connection with the credit monitoring and identity theft protection product offered as part of the notification letter provided by Defendant or otherwise.

8. Tell me more about Cash Payment B – Alternate Cash.

As an alternative to Cash Payment A, Settlement Class Members may submit a claim for Cash Payment B, which will entitle them to receive an estimated payment of \$100. This amount may increase or decrease based on the total number of Valid Claims received.

9. Tell me more about Medical Data Monitoring.

Medical Data Monitoring consists of two years of CyEx Medical Shield Complete, which includes credit monitoring with one bureau, healthcare insurance plan ID monitoring, Medicare beneficiary identifier ID monitoring, medical record number monitoring, international classification of disease monitoring, national provider identifier monitoring, health savings account monitoring, dark web monitoring, high-risk transaction monitoring, \$1,000,000 of insurance coverage for fraud/identity theft with no deductible, security freeze assist, victim assistance, and customer support.

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

Unless you opt-out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this settlement resolves. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.southtexasoncologydatasettlement.com.

HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM

11. How do I submit a Claim Form and get Settlement Class Member benefits?

You must submit a Claim Form by **July 6, 2026**. Claim Forms may be submitted online at www.southtexasoncologydatasettlement.com or mailed to the Settlement Administrator at Settlement Administrator - 83383, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.

12. When will I get my Settlement benefits?

After the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **July 21, 2026, at 9:00 a.m. CT**, to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Class Counsel for representing the Settlement Class, and Service Award payments to the Class Representatives who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Class Member Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes, the Court appointed Jeff Ostrow of Kopelowitz Ostrow P.A., Tyler J. Bean of Siri & Glimstad LLP, and Charles E. Schaffer of Levin Sedran & Berman LLP, to represent you and other members of the Settlement Class (“Class Counsel”). You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

If you want to be represented by your own lawyer, you may hire one at your own expense.

14. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys’ fees up to \$358,333.33, reimbursement of costs, and \$2,500 Service Award payments to each of the Settlement Class Representatives. If approved, these amounts will be paid from the \$1,075,000 Settlement Fund before making payments to Settlement Class Members who submit Valid Claims.

OPTING OUT OF THE SETTLEMENT

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

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to opt-out of the

Settlement Class. The Opt-Out Deadline to submit a request to opt-out of the Settlement is **June 22, 2026**.

To opt-out of the Settlement, you must submit a written request to opt-out the Settlement Administrator that includes the following information:

- Your name, address, telephone number, and email address (if any);
- A statement indicating that you want to opt-out of the Settlement Class, such as “I wish to opt-out of the Settlement Class in *Flores et al. v. South Texas Oncology and Hematology, PLLC*, Case No. 2024CI13299”; and
- Your personal signature.

Your request to opt-out must be mailed to the Settlement Administrator at the address below, postmarked no later than **June 22, 2026**.

Settlement Administrator - 83383
c/o Kroll Settlement Administration
ATTN: Opt-Out Request
PO Box 225391
New York, NY 10150-5391

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I do not like the settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for attorneys’ fees and costs, or Service Award payments, the releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include:

- a. your full name, mailing address, telephone number, and email address (if any);
- b. the grounds for the objection, including any legal support for the objection known to you or your counsel;
- c. the number of times you have objected to a class action settlement within the five years preceding the date of your objection, the caption of each case you objected to, 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;
- d. 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 and Costs and/or Service Award payments;
- e. the number of times your counsel and/or counsel’s law firm has objected to a class action settlement within the five years preceding the date of your objection, the caption of each case counsel or the firm has made such objection and a copy of any orders related to or ruling upon those prior objections that were issued by the trial and appellate courts in each listed case in which your counsel and/or counsel’s law firm have objected to a class action settlement within the preceding five years;

- f. the identity of all counsel (if any) representing you who will appear at the Final Approval Hearing;
- g. a list of all persons who will be called to testify at the Final Approval Hearing in support of your objection (if any);
- h. a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- i. your signature (an attorney's signature is not sufficient).

Objections must be filed with the Court no later than **June 22, 2026**.

438th Judicial District Court of Bexar County, Texas
Clerk of the Court
100 Dolorosa St.
San Antonio, TX 78205

A copy of your objection also must be mailed to Class Counsel, Defense Counsel and the Settlement Administrator at the addresses below, postmarked no later than **June 22, 2026**.

CLASS COUNSEL	DEFENSE COUNSEL	SETTLEMENT ADMINISTRATOR
Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 -and- Tyler J. Bean Siri & Glimstad LLP 745 Fifth Avenue, Suite 500 New York, NY 10151 -and- Charles E. Schaffer Levin Sedran & Berman LLP 510 Walnut Street, Suite 500 Philadelphia, Pa. 19106	David Ross Wilson Elser LLP 1500 K Street, NW Suite 330 Washington, D.C. 20005 Matthew Foree Wilson Elser LLP 3348 Peachtree Rd. NE Suite 1400 Atlanta, GA 30326	<i>Settlement Administrator -</i> <i>83383</i> c/o Kroll Settlement Administration PO Box 225391 New York, NY 10150-5391

18. 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 it. Opting out of the Settlement means telling the Court 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

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

The Court is scheduled to hold a Final Approval Hearing on **July 21, 2026, at 9:00 a.m. CT**, at 438th Judicial District Court of Bexar County, 100 Dolorosa St., 4th floor, San Antonio, Texas 78205, to decide

whether to approve the Settlement, how much attorneys' fees and costs to award to Class Counsel for representing the Settlement Class, and whether to award Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.southtexasoncologydatasettlement.com for updates.

20. 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 file an objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the releases of the Released Parties in the Settlement and not be eligible to receive any Settlement benefits.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.southtexasoncologydatasettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone, or by mail:

Toll-Free: (833) 630-5404

Mail: *Settlement Administrator* - 83383, c/o Kroll Settlement Administration, PO Box 225391, New York, NY 10150-5391.

PLEASE DO NOT CONTACT THE COURT OR DEFENDANT.