

Exhibit E

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the District of Montana

In re: Snowflake, Inc. Data Security Breach Litigation

Case No.: 2:24-cv-03126 (D. Mont.)

This Settlement relates only to Defendants Advance Auto Parts, Inc. and Advance Stores Company, Inc.

The Court has authorized this Long Form Notice (“Notice”). This is not a solicitation from a lawyer.

If you are a person in the United States who was sent notification from Advance Stores Company, Incorporated (“Advance Auto”) that your Private Information was potentially compromised as a result of the Data Incident, you are eligible to receive a Settlement Class Member Benefit from a class action Settlement

- The Court authorized this Notice to those that are eligible to receive Settlement Class Member Benefits from a proposed class action Settlement. The Action is titled *In re: Snowflake, Inc. Data Security Breach Litigation*, Case No.: 2:24-cv-03126, and is pending in the United States District Court for the District of Montana. The persons who filed the class action lawsuit are called Plaintiffs or Class Representatives. Two of the companies they sued are Advance Auto Parts, Inc. and Advance Stores Company, Incorporated (collectively “Defendant”). Defendant denies any wrongdoing whatsoever. No court has ever found that Defendant has any liability for the Data Incident.

- **Who is a Settlement Class Member?**

All persons in the United States whose Private Information was potentially compromised as a result of the Data Incident experienced by Advance Auto.

Excluded from the Settlement Class are (a) all persons who are governing board members of Defendant; (b) governmental entities; and (c) the Court, the Court’s immediate family, and Court staff; and (d) any Settlement Class Member who timely and validly requests to opt-out from the Settlement.

- Settlement Class Members under the Agreement will be eligible to receive:

- ❖ **Documented Losses - Cash Payment:** Settlement Class Members may submit a claim for a Cash Payment for up to **\$5,000** per Settlement Class Member upon presentment of documented losses related to the Data Incident. ***You must submit reasonable documentation supporting the losses;***

AND/OR

- ❖ **CCPA Cash Payment:** If you are a California resident, you can make a claim for a payment of an estimated **\$100.00** in recognition of your claims under the California Consumer Privacy Act (subject to pro rata increase or decrease).

AND/OR

- ❖ **Credit and Identity Monitoring:** Settlement Class Members can submit a claim for two years of Kroll Essential Monitoring credit and identity monitoring services.

Questions? Go to www.website.com or call (XXX) XXX-XXXX

OR

- **Alternative Cash Payment:** Settlement Class Members may submit a claim for an estimated \$100 cash payment (subject to pro rata increase or decrease). To submit a Claim or obtain more information visit www.website.com or call (XXX) XXX-XXXX to request a Claim Form no later than <<Claim Form Deadline>>.

Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive a Settlement Class Member Benefit from the Settlement.	Submitted or postmarked on or before <<Claim Form Deadline>>.
Exclude Yourself by Opting Out of the Class	Receive no benefit from the Settlement. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant relating to the Data Incident.	Mailed and postmarked on or before <<Opt-Out Period>>. Alternatively, you may complete an electronic opt-out request at [website].
Object to the Settlement and/or Attend the Final Approval Hearing	You can write the Court about why you agree or disagree with the Settlement or the Application for Attorneys' Fees, Costs, and Service Awards. The Court cannot order a different settlement. You can also ask to speak at the Final Approval Hearing on <<Final Approval Hearing date>>, about the fairness of the Settlement, with or without your own attorney.	Mailed and postmarked on or before <<Objection Period>>. Alternatively, objections and the required contents can be submitted electronically at [website].
Do Nothing	You will be a Settlement Class member but you will not receive any Settlement Class Member Benefit from this class action Settlement.	N/A

- Your rights and options as a Settlement Class Member – **and the deadlines to exercise your rights** – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Benefits to Settlement Class Members will be made only if the Court approves the Settlement and after any possible appeals are resolved.

What This Notice Contains

Questions? Go to www.website.com or call (XXX) XXX-XXXX

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BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give Final Approval to the Settlement. This Notice explains the nature of the Action that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Brian M. Morris of the United States District Court for the District of Montana is overseeing this case captioned *In re: Snowflake, Inc. Data Security Breach Litigation*, Case No.: 2:24-md-03126. The people who brought the lawsuit are called the Class Representatives. The companies being sued, Advance Auto Parts, Inc. and Advance Stores Company, Incorporated (collectively “Advance Auto”) are called the Defendant.

2. What is the Action about?

Defendant is an automotive parts corporation that operates retail stores primarily in the United States. In the course of operating its business, Defendant maintains and stores Private Information pertaining to employees and candidates for employment including, but not limited to, names, email addresses, mailing addresses, dates of birth, driver’s license numbers, Social Security numbers, demographic details, and more.

The Action alleges that, on May 24, 2024, Defendant became aware that it was the victim of a data incident involving its cloud computing software company that housed Private Information belonging to Defendant’s job applicants, former employees, and current employees. On July 10, 2024, Defendant began notifying those who sought employment with Defendant, former employees, and current employees that their information may have been involved in the Data Incident. In total, there were over 2.3 million people who, because of their relationship with the Defendant, were impacted by the Data Incident.

Defendant denies any wrongdoing whatsoever. The Court has not decided in favor of the Plaintiffs or the Defendant. Instead, Plaintiffs and Defendant have agreed to settle the Litigation.

3. Why is this a class action?

In a class action, one or more people called “Class Representatives” or “Plaintiffs” sue on behalf of all people who have similar claims. Together, all of these people are called a “Settlement Class,” and the individuals are called “Settlement Class Members.” One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Class Representatives appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel, think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are affected by the Settlement and potentially a Settlement Class Member if you are a person in the United States who was sent notification from Advance Auto that their Private Information was potentially compromised as a result of the Data Incident.

Only Settlement Class Members are eligible to receive Benefits under the Settlement. Excluded from the Settlement Class are: (a) all persons who are governing board members of Defendant; (b) governmental entities; and (c) the Court, the Court's immediate family, and Court staff; and, (d) any Settlement Class Member who timely and validly requests to opt-out from the Settlement.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call (XXX) XXX-XXXX with questions. You may also write with questions to:

Advance Auto Data Incident Action
c/o Kroll Settlement Administration LLC
P.O. Box XXXX
New York, NY 10150-XXXX

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides the following Settlement Class Member Benefits available to Settlement Class Members who submit Valid Claims:

- (1) **Documented Loss Cash Payment:** Settlement Class Members may submit a claim for a Cash Payment for up to \$5,000 per Settlement Class Member upon presentment of documented losses related to the Data Incident. Class Members must submit reasonable documentation supporting the losses;
- (2) **CCPA Cash Payment:** If a Class Member is a California resident, that Class Member can make a claim for a cash payment of an estimated \$100.00 (subject to pro rata increase or decrease) in recognition of their claims under the California Consumer Privacy Act.
- (3) **Either two years of Credit and Identity Monitoring, or an Alternative Cash Payment:**
 - a. **Credit and Identity Monitoring:** Settlement Class Members may submit a claim for two years of Kroll Essential Monitoring, a comprehensive credit and identity monitoring product; or,
 - b. **Alternative Cash Payment:** Settlement Class Members may submit a claim for an estimated \$100 cash payment (subject to pro rate increase or decrease).

HOW DO YOU SUBMIT A CLAIM?

8. How do I get a Settlement Class Member Benefit?

To receive a Settlement Class Member Benefit, you must complete and submit a Claim Form online

Questions? Go to www.website.com or call (XXX) XXX-XXXX

at www.website.com or by mail to *Advance Auto Data Incident Action*, c/o [Settlement Administrator's Address]. Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by <<Claim Form Deadline>> or by mail postmarked by <<Claim Form Deadline>>.

TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR VALID CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT WWW.WEBSITE.COM

9. When will I get my Settlement Class Member Benefit?

The Court will hold a Final Approval Hearing on <<Date>>, at <<Time>> a.m. Mountain Time to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving them can take time. It also takes time for all the Claim Forms to be processed. Please be patient. Payments will begin after the Settlement has obtained Court approval and the time for all appeals has expired.

10. What am I giving up as part of the Settlement?

Defendant and its affiliates will receive Releases from all Released Claims that could have been or that were brought against Defendant relating to the Data Incident. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant, and its present and former parents, subsidiaries, divisions, departments, affiliates, predecessors, successors and assigns, and any and all of their past, present, and future directors, officers, executives, officials, principals, stockholders, heirs, agents, insurers, reinsurers, members, attorneys, accountants, actuaries, fiduciaries, advisors, consultants, representatives, partners, joint venturers, licensees, licensors, independent contractors, subrogees, trustees, executors, administrators, predecessors, successors and assigns, and any other person acting on Defendant's behalf, in their capacity as such, and assigns of each of them as well as covered entities associated with the Data Incident. Excluded from the scope of the Release, including for Settlement Class Members, is consumer-oriented information that was also exposed in the Data Incident, including customer profile information, order details, loyalty program data, and sales history. These Releases are described in Section XIII of the Agreement, which is available at www.website.com. If you have any questions, you can talk to the law firms listed in Question 17 for free or you can talk to your own lawyer.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of the Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as "opting out" of the Settlement Class.

11. If I exclude myself, can I get a Settlement Class Member Benefit from this Settlement?

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement.

12. If I do not exclude myself, can I sue the Released Parties for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant and any other Released Parties for any claim that could have been or was brought relating to the Data Incident. You must exclude yourself from the Settlement to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

13. How do I exclude myself from the Settlement?

To exclude yourself, send a request to opt-out or written notice of intent to opt-out that says you want to be excluded from the Advance Auto Settlement in *In re: Snowflake, Inc. Data Security Breach Litigation*, Case No.: 2:24-md-03126. The opt-out request must be personally signed by the Settlement Class Member and contain the name, address, telephone number, and email address (if any), and include a statement indicating a request to be excluded from the Settlement Class. You must mail your opt-out request to the Settlement Administrator **postmarked by <<end of the Opt-Out Period>>**, to:

Advance Auto Data Incident Action
c/o [Settlement Administrator's Address]

Alternatively, you may fill out, e-sign, and submit an electronic opt-out request at [website].

OBJECTING TO THE SETTLEMENT

14. How do I tell the Court that I do not like the Settlement?

You can tell the Court that you do not agree with the Settlement, and/or Application for Attorneys' Fees, Costs, and Service Awards or some part of it by objecting to the Settlement. For an objection to be a valid objection under the Settlement, it must be mailed to the Settlement Administrator at the addresses listed below, **postmarked by no later than <<end of the Objection Period>>**.

Advance Auto Data Incident Action
c/o [Settlement Administrator's Address]

Any objections sent to the Settlement Administrator will be promptly delivered to Defendant's Counsel and Class Counsel, who will document your objection on the Court's public docket.

Your objection must be written and must include all of the following:

- i) the objector's full name, mailing address, telephone number, and email address (if any);
- ii) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- iii) 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;
- iv) 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;
- v) 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 (5) years preceding the date of the filed objection and the caption of each case in which counsel or the firm has made such objection, including the captions of any appeals related to those objections;
- vi) any and all agreements that relate to the objection or the process of objecting—whether written or oral—between objector or objector's counsel and any other person or entity;

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- vii) the identity of all counsel (if any) representing the objector 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 the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- x) the objector's signature (an attorney's signature is not sufficient).

Alternatively, objections and the aforementioned required contents can be submitted electronically at [website].

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel.

15. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement or parts of it and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, you have no basis to object because you are no longer a Settlement Class Member, and the case no longer affects you.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes. The Court appointed the lawyers and law firms below as Class Counsel to represent the Settlement Class in Settlement negotiations. If you want to be represented by your own lawyer, you may hire one at your own expense.

Class Counsel

J. Devlan Geddes
Goetz, Geddes & Gardner P.C.

Raphael Graybill
Graybill Law Firm,
PC

John Heenan
Heenan & Cook, PLLC

Amy Keller
DiCello Levitt LLP

Jason S. Rathod
Migliaccio & Rathod LLP

17. How will the lawyers be paid?

Class Counsel will file an Application for Attorneys' Fees, Costs, and Service Awards for an award of attorneys' fees to be paid from the Settlement Fund up to 33.33% of the Settlement Fund (\$3,333,333.33), plus reimbursement of costs. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this

representation on a wholly contingent basis.

Class Counsel will include a request for Service Award payments for the Class Representatives in recognition for their contributions to this Action not to exceed \$2,500 per Class Representative, from the Settlement Fund.

Any attorneys' fees, costs and Service Award payments must be approved by the Court. The Court may award less than the amounts requested.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at <<Time>> Mountain Time on <<Date>>, at the <<Court Address>>, Room [] as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the Application for Attorneys' Fees, Costs, and Service Awards. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking the Settlement Website www.website.com, or calling (XXX) XXX-XXXX.

19. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Class to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 15, the Court will consider it.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file an objection according to the instructions in Question 15, including all the information required. Your objection must be mailed to the Clerk of the Court, Class Counsel, Defendants' Counsel and the Settlement Administrator, at the mailing addresses listed above, **postmarked by no later than the <<end of the Objection Period>>.**

IF YOU DO NOTHING

21. What happens if I do nothing?

If you do nothing, you will not receive any benefits from this Settlement. If the Settlement is granted Final Approval and becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or the other Released Parties based on any claim that could have been or that was brought relating to the Data Incident.

ADDITIONAL INFORMATION

22. How do I get more information?

This Notice summarizes the Settlement. More details are in the Agreement itself. A copy of the Agreement is available at www.website.com. You may also call the Settlement Administrator with questions or to receive a Claim Form at (XXX) XXX-XXXX.

23. What if my contact information changes or I no longer live at my address?

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below, calling toll-free (XXX) XXX-XXXX or at the Contact page of the Settlement Website:

Advance Auto Data Incident Action
c/o [Settlement Administrator's Address]

**PLEASE DO NOT CONTACT THE COURT OR CLERK OF THE COURT FOR
INFORMATION ABOUT THE CLASS ACTION SETTLEMENT**