

# Exhibit E

**A proposed Settlement has been reached in a class action lawsuit known as *Braman et al. v. GDP Holdings, LLC et al.*, Case No. 1:23-cv-15656, filed in the United States District Court for the Northern District of Illinois**

**What is this Lawsuit about?** The people who brought the Lawsuit are called the Settlement Class Representatives. The company being sued, GDP Holdings, LLC d/b/a/ CoinFlip and CF Preferred LLC d/b/a Olliv (“CoinFlip”), are called the Defendants. The Lawsuit alleges that on August 7, 2023, an unauthorized third-party infiltrated the account of a CoinFlip employee utilizing social engineering techniques. CoinFlip discovered the breach on August 8, 2023 and removed the unauthorized party from CoinFlip’s systems. Despite CoinFlip’s speedy response, the unauthorized third-party may have accessed selected user data for 36,646 CoinFlip users; 4,496 of these users were located in California. Social Security Numbers of customers were NOT accessed as a result of the breach. Defendants deny these claims and say they did nothing wrong.

**Who is a Settlement Class Member?**

Settlement Class Member: All 36,646 CoinFlip users in the United States whose data were potentially accessed by the unauthorized third-parties as a result of the August 7, 2023 Data Breach.

You may also be in the subclass if you resided in the state of California during the Data Breach Class Action.

California Resident Settlement Subclass member: the 4,496 CoinFlip users who are residents of the State of California and whose data were potentially accessed by the unauthorized third-parties as a result of the August 7, 2023 Data Breach.

Excluded from the Settlement Class & California Resident Settlement Subclass are: (1) Defendants, its insurers, any parent, subsidiary, affiliate, or controlled person of Defendants, as well as their attorneys, officers, directors, agents, servants, or employees, and the immediate family members of such persons; (2) the named counsel in the Data Breach Class Action and any employee of their office or firm; (3) the members of the Illinois judiciary; and (4) all Settlement Class Members who timely and validly request exclusion from the Settlement Class.

**What are the benefits?** The Settlement provides the following benefits:

- **Reimbursement for any Out-of-Pocket Losses and/or Transaction Losses** – All Settlement Class Members may submit a claim up to **\$2,500** for reimbursement of Out-of-Pocket Losses up to **\$5,000** for Transaction Losses with supporting documentation of actual monetary losses, that were a direct result of the Data Breach Class Action;
- **Lost Time** – All Settlement Class Members may submit a claim for reimbursement of Lost Time up to three (3) hours at a rate of **\$25** per hour (\$75 total); **AND**
- **CCPA Payment** – California Settlement Subclass Members may submit a claim for an estimated **\$100** cash payment available to them as California residents in addition to the Settlement benefits above.

**How to make a claim.** You must file a Claim Form by mail postmarked by <<60 days from Notice Date>>, and mailed to the Settlement Administrator's address below, or online at [www.cyrptobreachsettlement.com](http://www.cyrptobreachsettlement.com) by <<60 days from Notice Date>> to receive *Pro Rata* Monetary Payments from the Settlement.

**What are my other rights?**

- **Do Nothing:** If you do nothing, you will not receive a payment and remain in the Settlement. You give up your rights to sue Defendant or bring any other lawsuit against the Released Persons for the same claims.
- **Exclude yourself:** You can get out of the Settlement and keep your right to sue about the claims in this Lawsuit, but you will not get any reimbursement from the Settlement. You must submit a valid and timely Opt-Out Request to the Settlement Administrator by << Opt-Out Period>>.
- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted by << Objection Deadline>>. You may also request to appear at the Final Approval Hearing. Detailed instructions on how to file a Claim Form, exclude yourself, object, or appear at the hearing can be found on the Class Notice found on the Settlement Website. The Court will hold the Final Approval Hearing on <<Final Approval Hearing Date>> at <<Time>> a.m. CT, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Class Counsel's request for attorneys' fees and expenses that will not exceed one-third (1/3) of the Settlement Fund (\$158,333.33) and out-of-pocket expenses not to exceed \$10,000, plus a Service Award of \$10,000 to each Settlement Class Representative, and to consider whether and if it should be approved. You may attend the hearing, with your own attorney at your own expense, but you don't have to.

***This is only a summary.*** For more information, including a copy of the Settlement Agreement, Class Notice, Claim Form and other documents, or to change or update your contact information, visit [www.cryptobreachsettlement.com](http://www.cryptobreachsettlement.com) or call (833) 421-9696. You may also contact the Settlement Administrator at CoinFlip Data Breach Class Action Lawsuit, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.