

# Exhibit D

**A proposed Settlement has been reached in a class action lawsuit known as *Burnelle et al. v. Sage Home Loans Corp.*, Case No. 0:24-cv-00972-MGL, filed in the United States District Court for the District of South Carolina.**

**What is this Action about?** This Action is known as *Burnell et al. v. Sage Home Loans Corp.*, Case No. 0:24-cv-00972-MGL, filed in the United States District Court for the District of South Carolina. The Persons who sued are called the “Plaintiffs” or “Class Representatives” and the company they sued, Sage Home Loans Corporation f/k/a Lenox Financial Mortgage Corporation d/b/a/ Weslend Financial (“SHLC”), is known as the “Defendant” in this case. SHLC, as part of its business operations, collects and stores personal information pertaining to its customers, including, but not limited to, names, addresses, Social Security numbers, driver’s license numbers, loan numbers, and financial information. SHLC also collects personal information, such as names, addresses and Social Security numbers, of employees in connection with their employment.

**What Happened?** The Action alleges that on or about December 19, 2023, SHLC noticed suspicious activity on its network. In response, SHLC immediately took steps to secure its network and launched an investigation that revealed that an unauthorized actor accessed individuals’ Personal Information and exfiltrated data from SHLC’s network to an unknown location. At the time of the Data Incident, SHLC had approximately 135,000 customers who had provided personal information to SHLC while obtaining a mortgage, and employees who provided personal information in connection with their employment. SHLC denies any wrongdoing whatsoever.

**What Information Was Involved?** The information that was impacted varies by individual, but could have included name, address, Social Security number, date of birth, driver’s license number, and financial account numbers.

**Who is a Settlement Class Member?** You are a Settlement Class Member if you are a living individual residing in the United States whose Personal Information may have been impacted in the Data Incident. Excluded from the Settlement Class: (a) all persons who are directors, officers, and agents of SHLC; (b) governmental entities; and (c) the Judge assigned to the Action, that Judge’s immediate family, and Court staff. The Settlement Class comprises 133,987 individuals for whom SHLC had Personal Information at the time of the Data Incident

**What are the Settlement Class Member Benefits?** The Settlement provides the following benefits or “Cash Payments” for Settlement Class Members that file Valid Claims:

- **Compensation for Ordinary Losses:** Compensation for unreimbursed ordinary losses fairly traceable to the Data Incident, may be up to a total of \$1,500 per person. Settlement Class Members must submit documentation supporting their Claims for ordinary losses.
- **Compensation for Lost Time:** Settlement Class Members with time spent remediating issues related to the Data Incident may receive reimbursement of \$25 per hour up to five hours (for a total of \$125) with an attestation; OR
- **Alternate Compensation:** Instead of selecting compensation for ordinary losses or compensation for lost time, a Settlement Class Member may elect to receive a flat payment in the amount of \$50.

**What You Can Do?** Settlement Class Members under the Settlement Agreement will be eligible to receive the Settlement Class Member Benefits discussed above. To submit a claim, you must

file a Claim Form by mail postmarked by <<Claim Form Deadline>>, and mailed to the Settlement Administrator's address below, or online at [www.website.com](http://www.website.com) by <Claim Form Deadline>, to receive compensation from the Settlement.

**What are my other rights?**

- **Do nothing:** If you do nothing, you will not receive a compensation and remain in the Settlement. You give up your rights to sue SHLC or any other released party related to the Security Incident.
- **Exclude yourself:** You can get out of the Settlement and keep your right to sue SHLC related to the Security Incident, but you will not receive any compensation from the Settlement. You must submit a valid and timely request for exclusion to the Settlement Administrator by <<Opt-Out Period>>
- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement or parts of it should not be approved. Your written objection must be submitted by <<Objection Period>>. You may also request to appear at the Final Approval Hearing. Detailed instructions on how to file a Claim Form, exclude yourself, object, or request to appear at the hearing can be found on the Long-Form Notice found on the Settlement Website available at [www.website.com](http://www.website.com). The Court will hold the Final Approval Hearing on <<Date>> at <<Time>> a.m. ET, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards that will not exceed 33.33% of the Settlement Fund (\$308,333) and reimbursement of reasonable costs, plus a Service Awards of \$5,000 to each Class Representative, and to consider whether and if the proposed Settlement and Class Counsel's Application for Attorneys' Fees, Costs and Service Awards should be approved. You may attend the hearing, but you don't have to.
- **More information:** For more information, including a copy of the Settlement Agreement, Long-Form Notice, Claim Form, Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards, when available, and other documents, or to change or update your contact information, visit the Settlement Website at [www.website.com](http://www.website.com), or call (XXX) XXX-XXXX. You may also contact the Settlement Administrator at *SHLC Security Incident Action, c/o Kroll Settlement Administration LLC, PO Box XXXX, New York, NY 10150-XXXX*.