

Exhibit E

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
United States District Court District of South Carolina

Burnelle et al. v. Sage Home Loans Corp.
Case No. 0:24-cv-00972-MGL (“Action”)

A Court has authorized this Notice. This is not a solicitation from a lawyer.

Your Personal Information May Have Been Impacted By Suspicious Activity On Sage Home Loans Corporation’s (“SHLC”) Network (the “Data Incident”). As A Result, You Are Eligible to Receive Payments from a Class Action Settlement.

- If you are receiving this Notice, you are eligible to receive a payment from a proposed \$925,000 class action Settlement. The Action is titled *Burnelle et al. v. Sage Home Loans Corp.*, Case No. 0:24-cv-00972-MGL and is pending in the United States District Court for the District of South Carolina. The persons who filed the class action lawsuit are called Plaintiffs or “Class Representatives,” and the company they sued is Sage Home Loans Corporation f/k/a Lenox Financial Mortgage Corporation d/b/a/ Weslend Financial (“Defendant” or “SHLC”). 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, to the Data Incident, SHLC immediately took steps to secure its network and launched an investigation that revealed that an unauthorized actor accessed individuals’ Personal Information (“PI”) 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.
- **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.
- **What You Can Do?** Settlement Class Members under the Settlement Agreement will be eligible to receive the following. To submit a Claim visit www.website.com or call (XXX) XXX-XXXX to request a Claim Form no later than <<Claim Form Deadline>>:
 - ❖ **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 remedying 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, including a brief description of the action(s) taken in response to the Data Incident; OR

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

❖ **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.

- For more information, visit www.website.com or call (XXX) XXX-XXXX.
- **Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**
- SHLC denies any wrongdoing whatsoever and denies that it has any liability but has agreed to settle the lawsuit on a class-wide basis.

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive a Cash Payment for compensation for ordinary losses and compensation for lost time 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 SHLC relating to the Data Incident.	Mailed and postmarked on or before <<Opt-Out Period>> .
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. 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>> .
Do Nothing	You will not receive any Claim Payment 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. Payments to Settlement Class Members will be made only if the Court approves the Settlement and after any possible appeals are resolved.

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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 lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

The Honorable Judge Lewis of the United States District Court for the District of South Carolina is overseeing this case captioned as *Burnelle et al. v. Sage Home Loans Corp.*, Case No. 0:24-cv-00972-MGL. The people who brought the lawsuit are called the Class Representatives. The company being sued, Sage Home Loans Corporation f/k/a Lenox Financial Mortgage Corporation d/b/a/ Weslend Financial, is called the Defendant.

2. What is the Action about?

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. The Action alleges that on or about December 19, 2023, SHLC noticed suspicious activity on its network. In response to the Data Incident, 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.

SHLC also collects personal information, such as names, addresses and Social Security numbers, of employees in connection with their employment.

SHLC denies any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that SHLC has done anything wrong.

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 SHLC. 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 living individual residing in the United States whose Personal Information may have been impacted in the Data Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Specifically excluded from the Settlement Class are: (a) all persons who are directors and officers 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.

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:

SHLC Data Incident Action
c/o Kroll Settlement Administration LLC
PO 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 that SHLC will create a Settlement Fund that pays for the following Settlement Class Member Benefits, or Cash Payments: (a) compensation for ordinary losses (b) compensation for lost time; or (c) flat payment as an alternate compensation, instead of selecting compensation for ordinary losses or lost time. Note that Settlement Class Members are subject to an individual aggregate cap of \$1,500 for payments made under the Settlement for compensation for ordinary losses.

Settlement Class Cash Payments will be subject to a *pro rata* increase from the Net Settlement Fund in the event the amount of Valid Claims is insufficient to exhaust the entire Net Settlement Fund. Similarly, in the event the amount of Valid Claims exhausts the amount of the Net Settlement Fund, the amount of the Cash Payments may be reduced *pro rata* accordingly. Any *pro rata* increases or decreases to Cash Payments will be equally throughout the Settlement Fund. If a Settlement Class Member does not submit a Valid Claim, the Settlement Class Member will release his or her claims against the Released Parties without receiving a Settlement Class Member Benefit.

SHLC provided Class Counsel with a “Security Attestation” attesting to the security measures it is implementing following the Data Incident. SHLC confirms that all of these security measures have been implemented.

8. What payments are available for reimbursement under the Settlement?

Each Claimant who submits a valid and timely Claim Form may qualify for one of the following:

- a) **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. This documentation may include receipts or other documentation not “self-prepared” by the claimant that documents the costs incurred. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation. Settlement Class Members shall 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.
 - These ordinary losses may include the following:
 - *Out of pocket expenses incurred* as a result of the Data Incident, including bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, or gasoline for local travel; and
 - *Fees for credit reports, credit monitoring, or other identity theft insurance product* purchased between November 15, 2023, and the date of the Claim Form Deadline.
- b) **Compensation for Lost Time:** Settlement Class Members with time spent remedying 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 including a brief description of the action(s) take in response to the Data Incident.
- c) **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.

HOW DO YOU SUBMIT A CLAIM?

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

To receive a Cash Payment, you must complete and submit a Claim online at www.website.com or by mail to *SHLC Data Incident Action*, c/o Kroll Settlement Administration LLC, PO Box XXXX, New York, NY 10150-XXXX. 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>>.

10. How will claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is a Valid Claim. The Settlement Administrator may require additional information from you. If you do not provide the additional information in a timely manner, the Claim will be considered invalid and will not be paid.

The Settlement Administrator, in its sole discretion to be reasonably exercised, will determine whether a Claim is:

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

- (i) submitted in accordance with the provisions of the Settlement;
- (ii) accurately, fully, and truthfully completed and executed, with all of the information requested in the Claim Form, by a Settlement Class Member;
- (iii) signed physically or by e-signature by a Settlement Class Member personally, subject to the penalty of perjury;
- (iv) returned via mail and postmarked by the **Claim Form Deadline**, or, if submitted online, submitted by 11:59 p.m. Eastern Time on the **Claim Form Deadline**; and
- (v) determined to be valid by the Settlement Administrator.

11. When will I get my Cash Payment?

The Court will hold a hearing on **<<Date>>**, at **<<Time>>** a.m. ET 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 of 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.

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

SHLC and its affiliates will receive a Release from all claims that could have been or that were brought against SHLC 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 SHLC, and each entity which is controlled by, controlling or under common control with SHLC, and its past, present, and future direct and indirect heirs, assigns, associates, corporations, investors, owners, parents, subsidiaries, affiliates, divisions, officers, directors, shareholders, members, agents, servants, employees, partners, attorneys, insurers, reinsurers, benefit plans, predecessors, successors, managers, administrators, executors, and trustees, known as Released Parties, any or all of the above persons or entities referenced in this paragraph, any Person related to any such entities relating to the Data Incident. This Release is described in the Settlement Agreement, which is available at **www.website.com**. If you have any questions, you can talk to the law firms listed in Question 18 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.

13. If I exclude myself, can I get a payment from this Settlement?

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

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

No. Unless you exclude yourself, you give up any right to sue SHLC and any other released party 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.

15. How do I exclude myself from the Settlement?

To exclude yourself, send a request for exclusion or written notice of intent to opt-out that says you want to be excluded from the Settlement in *Burnelle et al. v. Sage Home Loans Corp.*, Case No. 0:24-cv-00972-MGL. The letter must: be personally signed by the Settlement Class Member and contain the requestor’s 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 request for exclusion postmarked by **<<Opt-Out Period>>**, to:

SHLC Data Incident Action
 c/o Kroll Settlement Administration LLC
 PO Box **XXXX**
 New York, NY 10150-**XXXX**

OBJECTING TO THE SETTLEMENT

16. 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 or some part of it by objecting to the Settlement. Objections must be filed with the Court, and sent by email with a hard copy sent by overnight mail by U.S. Mail to Class Counsel, Defendant’s Counsel, and the Settlement Administrator, at the mailing addresses listed below, postmarked by **no later** than the **l a s t** **d a y** **o f** **t h e** Objection Period, **<<Objection Period>>**.

Clerk of the Court	Settlement Administrator
<<Court Address>>	SHLC Data Incident Action c/o Kroll Settlement Administration LLC PO Box XXXX New York, NY 10150- XXXX
Class Counsel	SHLC’s Counsel
Gary Klinger Milberg Coleman Bryson Phillips Grossman 227 West Monroe Street, Suite 2100 Chicago, Illinois 60606 gklinger@milberg.com David Lietz Milberg Coleman Bryson Phillips Grossman 5335 Wisconsin Avenue NW, Suite 440 Washington, D.C. 20015 dlietz@milberg.com	Aravind Swaminathan Orrick, Herrington & Sutcliffe LLP 401 Union St., Ste. 3300 Seattle, Washington 98101 aswaminathan@orrick.com

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

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

- 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 five (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;
- 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 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, 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 or counsel's law firm have objected to a class action settlement within the preceding 5 years;
- vi) the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- vii) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- viii) a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- ix) the objector's signature (an attorney's signature is not sufficient).

17. 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. If you submit both a valid objection and a valid request for exclusion, you will be deemed to have only submitted the request to be excluded.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Gary Klinger and David Lietz of Milberg Coleman Bryson Phillips Grossman PLLC, 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.

19. How will the lawyers be paid?

Class Counsel will file a fee application ("Application for Attorneys' Fees, Costs, and Service Awards") to be paid from the Settlement Fund. Class Counsel's request for an award of attorneys' fees of up to 33.33% of the Settlement Fund (\$308,333) plus reimbursement of reasonable costs.

These amounts would be paid from the Settlement Fund. 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 also ask the Court for a Service Award of up to \$5,000 for each of the Class Representatives.

Any Application for Attorneys' Fees, Costs, and Service Awards to the Class Representatives must be approved by the Court. The Court may award less than the amounts requested. Class Counsel's papers in support of the Motion for Final Approval of the Settlement will be filed no later than <<Motion for Final Approval Date>> and their Application for Attorneys' Fees, Costs, and Service Awards will be filed no later than <<Date>> and will be posted on the Settlement Website.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at <<Time>> ET 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, as well as the request for Service Awards payment for the Class Representatives. 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.

21. 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 16, the Court will consider it.

22. 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 16, including all the information required. Your Objection must be **mailed** to the Settlement Administrator, at the mailing addresses listed below, postmarked by no later than the last day of the **Objection Period**.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing, you 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 SHLC or the other Released Parties based on any claim that could have been or that was brought relating to the Data Incident.

ADDITIONAL INFORMATION

24. How do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement 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.

25. 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:

SHLC Data Incident Action
c/o Kroll Settlement Administration LLC
PO Box XXXX
New York, NY 10150-XXXX