

Exhibit B

EXHIBIT 1 (EMAIL NOTICE)

From: Administrator@XXXX.com
To: SettlementClassMemberName@domain.com
Re: Legal Notice: *Settlement in Crowe, et al. v. Managed Care of North America, Inc., et al.*

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Crowe, et al. v. Managed Care of North America, Inc., et al., Case No. 0:23-cv-61065-AHS
United States District Court for the Southern District of Florida

If you are a person who was sent a notice from Defendants that your Private Information was potentially impacted as a result of the Data Incident, you may be eligible to receive Settlement Class Member Benefits from a Class Action Settlement.

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

Name: <<First Name>> <<Last Name>>

Class Member ID: <<RefNum>>

Activation Code: <<CodeNumber>>

A Settlement has been reached with Managed Care of North America, Inc. ("MCNA, Inc."), MCNA Insurance Company ("MCNAIC," and together with MCNA, Inc., "MCNA"), and Healthplex, Inc. ("Healthplex") (collectively, the "Defendants") in a class action lawsuit. The lawsuit alleges that between February 26, 2023 and March 7, 2023, there was potential unauthorized access to personally identifiable information and private health information ("Private Information") on MCNA's computer systems (the "Data Incident"). The Plaintiffs allege negligence and breach of implied contract, among other claims. The Defendants deny all allegations and any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that Defendants have done anything wrong.

Who is included? The Defendants' records indicate you are likely a Settlement Class Member. The Settlement Class consists of all living individuals in the United States who were sent a notice of the Data Incident stating that their Private Information was potentially impacted in the Data Incident.

What does the Settlement provide? Under the proposed Settlement, the Defendants will pay for Settlement Class Member Benefits, all Settlement Administration Costs, and any Court-approved attorneys' Fees and Costs subject to the terms of the Settlement. The Settlement provides for cash payments for Documented Losses (up to \$2,500 per individual Claim and up to \$250,000 for all Settlement Class Members subject to pro rata reduction) to Settlement Class Members who file a Valid Claim. You also are automatically entitled to receive two years of <<Medical Data Monitoring product>>. Your enrollment code for the monitoring is: <<code>>. This code will become active for use within thirty days after the Effective Date, which is currently estimated to be **Month XX, 2026**. If you would like to confirm that the enrollment codes are active, please visit the Settlement Website at [www.\[website\].com](http://www.[website].com).

How do I get a Cash Payment for Documented Out-of-Pocket Losses? You must submit a Claim Form online at [www.\[website\].com](http://www.[website].com) by 11:59 p.m. ET on **Month XX, 2026** or by mail, postmarked by **Month XX, 2026**, to receive a Cash Payment for Documented Out-of-Pocket

Losses. Please visit the website for a full description of the Settlement Class Member Benefits and how to submit a Claim Form.

What are my other options? If you do nothing, you will be legally bound by the terms of the Settlement, will “release” your legal claims against the Defendants and the other Released Parties as defined in the Settlement Agreement, and will receive the Medical Data Monitoring benefit. If you do not want to be legally bound by the Settlement, you must request to be excluded from the Settlement (or “opt out”) by **Month XX, 2026**. If you want to object to the Settlement or some part of it, you may file an objection by **Month XX, 2026**. Please visit **www.[website].com** for more information on the claims you are releasing and instructions on how to opt out or object.

Who represents me? The Court appointed Jeff Ostrow of Kopelowitz Ostrow P.A., Peter Prieto of Podhurst Orseck, P.A., and Stephanie Casey of Colson Hicks Eidson, P.A. as Class Counsel to represent you and the Settlement Class Members. You will not be charged for these attorneys. If you want to be represented by your own lawyer, you may hire one at your own expense.

The Court’s Final Approval Hearing. The Court will hold a Final Approval Hearing on **Month XX, 2026** to consider approving the Settlement, the attorneys’ Fees and Costs of up to \$6,400,000, plus reimbursement of litigation costs of to \$1,313,000. You or your attorney may appear at the hearing at your own cost, but you do not have to.

How do I get more information? This Notice is only a summary. For more information, access to related documents, or to change your address, please visit **www.[website].com** or call toll-free **(XXX) XXX-XXXX**.