

EXHIBIT D-1

A proposed Settlement has been reached in a class action lawsuit known as *Gilbert et al. v. BioPlus Specialty Pharmacy Services, LLC*, Case No. 6:21-cv-02158-RBD-DCI, filed in the United States District Court for the Middle District of Florida

A settlement has been reached in a class action lawsuit against BioPlus Specialty Pharmacy Services, LLC arising out of a 2021 cybersecurity incident involving BioPlus (the “Data Incident”). Plaintiffs allege that the Data Incident resulted in unauthorized access by a third party to data stored on BioPlus’s network, which they allege included the personally identifiable information (“PII”) and protected health information (“PHI”) of BioPlus’s current and former patients. BioPlus disagrees with Plaintiffs’ claims and denies any wrongdoing.

You are receiving this notice because you may be a SSN Class Member. You are a SSN Class Member if you were notified that your PII/PHI, including Social Security Number, may have been impacted in the Data Incident.

Under the terms of the Settlement, you may submit a Claim for the following benefits:

- **Cash Payment:** \$50 cash payment, adjusted up or down depending upon the number of claims approved;
- **Documented Out-of-Pocket Loss Expense Reimbursement:** Reimbursement for up to \$7,500 for documented out-of-pocket expenses, AND
- **Lost Time Reimbursement:** Reimbursement for up to three (3) hours of lost time spent dealing with the Data Incident (at \$25 per hour).

SSN Class Members, like yourself, are able to submit a Claim for the settlement benefits described above from the non-reversionary \$1,025,000 SSN Settlement Fund. There are also Class Members who did not have their Social Security Numbers impacted in the Data Incident. They have the ability to submit a Claim against a separate \$1,175,000 reversionary settlement fund *i.e.*, the Non-SSN Settlement Fund. There are roughly 218,750 Non-SSN Class Members and 130,438 SSN Class Members. Class Counsel’s attorneys’ fees not to exceed \$733,333.33 or 1/3 of the combined total of the Non-SSN Settlement Fund and SSN Settlement Fund (\$2,200,000), Class Counsel’s litigation expenses not to exceed \$15,000, and the costs of Settlement Administration, subject to Court approval, will be deducted from the Non-SSN Settlement Fund in addition to Non-SSN Settlement Class Members’ valid Claims for up to \$750 for Documented Out-of-Pocket Expenses and Lost Time. The easiest way to submit a claim is online at www.XXXXX.com using your unique Notice ID found on the front of this postcard. To be eligible, you must complete and submit a Valid Claim Form, postmarked or submitted online by [INSERT DATE].

You can exclude yourself or object to the settlement, including Class Counsel’s request for attorneys’ fees and expenses, on or before [INSERT DATE]. If you do not exclude yourself from the Settlement, you will remain in the class and give up the right to sue BioPlus, BioPlus’s Related Entities, or the Released Parties for the Released Claims in the Settlement. **A summary of your rights under the Settlement and instructions regarding how to submit a Claim, exclude yourself, or object to the Settlement are available at www.XXXXX.com.**

The Court will hold the Final Fairness Hearing at [INSERT] to consider whether the proposed Settlement is fair, reasonable, and adequate. The Court will also consider Class Counsel’s request for an award of attorneys’ fees of up to \$733,333.33 plus case expenses. Defendant reserves the right to object to Class Counsel’s request for fees and expenses. The Court will also determine whether the Settlement should be approved. You may attend the hearing, at your own expense, but you do not have to.

Class Counsel are John Yanchunis and Ryan Maxey of Morgan & Morgan; Terence R. Coates and Dylan J. Gould of Markovits, Stock & DeMarco; M. Anderson Berry and Gregory Haroutunian of the Arnold Law Firm; Joseph M. Lyon of The Lyon Firm; Gerard Stranch of Stranch, Jennings & Garvey; Nicholas Migliaccio of Migliaccio Rathod; and Gary E. Mason of Mason LLP.

This is only a summary. For additional information, including a copy of the Settlement Agreement, Long Form Notice, Claim Form, Class Counsel’s Application for Attorneys’ Fees and Expenses, and other documents, visit [INSERT WEBSITE] or call [[INSERT PHONE #](tel:XXXXX)].

