

Exhibit D

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Northern District of Illinois, Eastern Division

Goodrum, et al. v. Veradigm, Inc.
Case No. 1:25-cv-07062

A Court authorized this Long Form Notice (“Notice”). This is not a solicitation from a lawyer.

If You Are A Person In The United States Whose Private Information May Have Been Impacted As A Result Of the Veradigm Data Incident, You May Be Eligible To Receive A Settlement Class Member Benefit From A Class Action Settlement

- A Court authorized this Notice to those that are eligible to receive Settlement Class Member¹ Benefits from a proposed class action Settlement. The Action is titled *Goodrum, et al. v. Veradigm, Inc.*, Case No. 1:25-cv-07062, and is pending in the United States District Court for the Northern District of Illinois, Eastern Division. The people that filed the class action lawsuit are called Plaintiffs or Class Representatives and the company they sued is Veradigm, Inc. (Defendant). Defendant denies any wrongdoing.

- **Who is a Settlement Class Member?**

All living individuals residing in the United States whose Private Information may have been impacted in the Data Incident.

Excluded from the Settlement Class are: (1) all persons who are directors, officers, and agents of the Defendant; (2) governmental entities; (3) the Judge assigned to the Action, that Judge’s immediate family, and Court staff; and (4) any Settlement Class Member who timely and validly requests to opt-out from the Settlement.

- Defendant has agreed to pay \$8,750,000 (“Settlement Fund”) to resolve all claims in the lawsuit. The Settlement Fund will be used to pay all Settlement Class Member Benefits, Court-approved Attorneys’ Fees and Costs to Class Counsel and Service Awards to the Class Representatives, and Settlement Administration Costs. Settlement Class Members under the Settlement Agreement will be eligible to receive:

❖ **Cash Payment A – Documented Losses:** Settlement Class Members are eligible to submit a claim for a Cash Payment for Documented Losses for up to \$5,000 per Settlement Class Member upon presentment of reasonable documentation of losses that are known to be the direct result of the Data Incident.

OR

❖ **Cash Payment B – Alternate Cash:** As an alternative to Cash Payment A above, a Settlement Class Member may elect to receive Cash Payment B, which is a cash payment in the estimated amount of \$50.

All Cash Payments will be subject to a *pro rata* increase or decrease depending on the

¹ Capitalized terms in this Notice are defined in the Settlement Agreement, which is available at www.XXX.com.

amount available in the Net Settlement Fund.

In addition to Cash Payment A or Cash Payment B, Settlement Class Members may also elect to receive the following:

- ❖ **Medical Data Monitoring** – Settlement Class Members may also make a Claim for Medical Data Monitoring that includes two years of CyEx’s medical data monitoring product. The product includes credit monitoring with one credit reporting agency, with additional dark web monitoring. The product also provides for \$1,000,000 of identity theft insurance and offers real-time alerts and victim and security freeze assistance.
- To submit a claim or obtain more information, visit www.XXX.com no later than <<DATE>> or call (XXX) XXX-XXXX to request a Claim Form.

Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive a Settlement Class Member Benefit from the Settlement.	Submitted or postmarked on or before <<DATE>>.
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 Defendant relating to the Data Incident.	Mailed and postmarked on or before <<DATE>>.
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 or the Application for Attorneys’ Fees, Costs and Service Awards. The Court cannot order a different settlement. You can also ask to speak at the Final Approval Hearing on <<DATE>>, about the fairness of the Settlement, with or without your own attorney.	Mailed and postmarked on or before <<DATE>>.
Do Nothing	You will not receive any Settlement Class Member Benefit 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 must decide whether to approve the Settlement. Benefits 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 Action that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

The Judge Honorable John Robert Blakey of the United States District Court for the Northern District of Illinois, Eastern Division, is overseeing this case captioned as *Goodrum, et al. v. Veradigm, Inc.*, Case No. 1:25-cv-07062. The people who brought the lawsuit are called the Plaintiffs or Class Representatives. The company being sued is Veradigm (Defendant).

2. What is the Action about?

The Action alleges that in December 2024, cybercriminals accessed certain systems within the Defendant's servers and may have acquired information belonging to approximately 2 million of Defendant's Clients' patients. The Private Information includes some combination of names, dates of birth, driver's license information, Social Security numbers, telephone numbers, and health information.

Defendant deny any wrongdoing. No Court or other judicial body has made any judgment or other determination that Defendant 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, 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 Defendant. 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 fair, adequate, reasonable, and in the best interests of the Settlement Class.

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 Private Information may have been impacted in the Data Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Excluded from the Settlement Class are: (1) all persons who are directors, officers, and agents of Defendant; (2) governmental entities; (3) the Judge assigned to the Action, that Judge's immediate family, and Court staff; and (4) any Settlement Class Member who timely and validly requests to opt-out from the Settlement.

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:

Settlement Administrator – xxxxx
c/o Kroll Settlement Administration LLC
PO Box XXX
New York, NY XXXXX

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides a \$8,750,000 Settlement Fund that will be used to pay: (1) all Settlement Class Member Benefits to Settlement Class Members who submit Valid Claims; (2) all Settlement Administration Costs; and (3) any attorneys' fees, costs, and Service Awards approved by the Court. The Settlement provides the following Settlement Class Member Benefits available to Settlement Class Members who submit Valid Claims: (a) Cash Payment A – Documented Losses, up to \$5,000 per Settlement Class Member upon presentment of reasonable documentation; *or* (b) Cash Payment B – Alternate Cash, an estimated \$50 cash payment; **and**, in addition to a Cash Payment, (c) Medical Data Monitoring that includes two (2) years of CyEx's Medical Shield Complete with one credit reporting agency.

8. What Settlement Class Member Benefits are available under the Settlement?

Settlement Class Members that submit a Valid Claim may select one of the following Cash Payments:

- a) **Cash Payment A – Documented Losses:** All Settlement Class Members are eligible to submit a claim for a Cash Payment for Documented Losses for up to \$5,000 per Settlement Class Member upon presentment of reasonable documentation of losses that are known to be the direct result of the Data Incident.

Questions? Go to www.xxx.com or call (xxx) xxx-xxxx

- Documented expenses include, by way of example, unreimbursed losses relating to fraud or identity theft: if (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was directly caused by the Data Incident; and (iii) the loss was incurred after the date of the Data Incident.
- To receive payment for documented losses, a Settlement Class Member must complete and submit a Claim Form and include documentation in support of the claim.
- Except as expressly provided herein, personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute proper documentation, but may be included to provide clarification, context, or support for other submitted reasonable 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 any credit monitoring and identity theft protection product.
- If a Settlement Class member does not submit documentation supporting a loss, or if the Settlement Administrator rejects for any reason the Settlement Class member's claim and the Settlement Class Member fails to cure the claim, the claim will be rejected.

OR

- b) **Cash Payment B – Alternate Cash:** As an alternative to Cash Payment A – Documented Losses above, a Settlement Class Member may elect to receive Cash Payment B – Alternate Cash, which is a cash payment in an *estimated* amount of \$50.

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 will be subject to a *pro rata* decrease.

In addition to electing a Cash Payment, Settlement Class Members may also elect:

- c) **Medical Data Monitoring:** In addition to Cash Payment A or Cash Payment B, Settlement Class Members may also make a Claim for Medical Data Monitoring that includes two (2) years of CyEx's Medical Shield Complete. The product includes credit monitoring with one credit reporting agency, with additional dark web monitoring. The product also provides for \$1,000,000 of identity theft insurance and contains real-time alerts and victim and security freeze assistance.

HOW DO YOU SUBMIT A CLAIM?

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

To receive a Settlement Class Member Benefit, you must complete and submit a Claim Form online at www.XXX.com or by mail to *Settlement Administrator* – [xxxxx](#), c/o Kroll Settlement Administration LLC, PO Box [XXX](#), New York, NY [XXXXX](#). Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by [<<DATE>>](#), 11:59 p.m. CT or by mail **postmarked by** [<<DATE>>](#).

TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR VALID CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT [WWW.XXX.COM](http://www.XXX.com)

10. When will I get my Settlement Class Member Benefit?

The Court will hold a Final Approval Hearing on <<DATE>> at xx a./p.m. CT 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.

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

Upon the Effective Date, and in consideration of the Settlement relief and other consideration described herein, Defendant and Defendant's Clients will fully, finally, and forever be released, acquitted, relinquished, and completely discharged from any and all Released Claims. The Releasing Parties agree that, once this Agreement is executed, they will not, directly or indirectly, individually or in concert with another, maintain, cause to be maintained, or voluntarily assist in maintaining any further demand, action, claim, lawsuit, arbitration, or similar proceeding, in any capacity whatsoever, based on any of the Released Claims. These Releases are described in Section XIII of the Settlement Agreement, which is available at www.XXX.com. If you have any questions, you can talk to the law firms listed in Question 17 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.

12. If I exclude myself, can I get a benefit from this Settlement?

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

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

No. Unless you exclude yourself, you give up any right to sue Defendant, Defendant's Clients, and any other Released Parties 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.

14. How do I exclude myself from the Settlement?

To exclude yourself, mail a request to opt-out that says you want to be excluded from the Settlement of *as Goodrum, et al. v. Veradigm, Inc.*, Case No. 1:25-cv-07062. The opt-out request must be personally signed by the Settlement Class Member and contain the requestor's name, address,

telephone number, and email address (if any), and a statement indicating a request to opt-out of the Settlement Class. Mass or class requests to opt-out filed by third parties on behalf of a class of Settlement Class Members or multiple Settlement Class Members where the opt-out has not been signed by each and every individual Settlement Class Member will not be allowed. Any Settlement Class Member who does not timely and validly request to opt-out shall be bound by the terms of the Agreement even if that Settlement Class Member does not submit a claim. You must **mail** your opt-out request to the Settlement Administrator **postmarked no later than <<DATE>>**, to:

Settlement Administrator – xxxxx
 c/o Kroll Settlement Administration LLC
 P.O. Box XXX
 New York, NY XXXXX

OBJECTING TO THE SETTLEMENT

15. 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 and/or Application for Attorneys' Fees, Costs and Service Awards, or some part of it, by objecting to the Settlement. For an objection to be a valid objection under the Settlement, it must be sent to the Clerk of Court, and sent by U.S. Mail to Class Counsel, Defendant's Counsel, and the Settlement Administrator at the addresses listed below, postmarked by **no later than <<DATE>>**.

Clerk of the Court	Class Counsel
<p>Clerk of the Court XXX XXX XXX</p>	<p>Gary Klinger Milberg Coleman Bryson Phillips Grossman PLLC 227 W. Monroe Street, Ste. 2100 Chicago, Illinois 60606 gklinger@milberg.com</p> <p>Jeff Ostrow Kopelowitz Ostrow P.A. 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 ostrow@kolawyers.com</p>

Defendant's Counsel	Settlement Administrator
<p style="text-align: center;">Alfred J. Saikali Shook, Hardy & Bacon L.L.P. 201 S. Biscayne Blvd., Ste. 3200 asaikali@shb.com</p>	<p style="text-align: center;">Settlement Administrator – XXXXXX c/o Kroll Settlement Administration LLC P.O. Box XXX New York, NY XXXXXX</p>

For an objection to be considered by the Court, your objection must be written and must include all of the following:

- a. the objector's full name, mailing address, telephone number, and email address (if any);
- b. the case name and case number: *Goodrum, et al. v. Veradigm, Inc.*, Case No. 1:25-cv-007062;
- c. documentation sufficient to establish membership in the Settlement Class, such as a copy of the Email Notice or Postcard Notice the objector received;
- d. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- e. the number of times the objector has objected to a class action settlement within the five 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;
- f. 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 and/or Application for Attorneys' Fees, Costs, and Service Awards;
- g. the number of times the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five 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 and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- h. the identity of all counsel (if any) representing the objector, and whether they will appear at the Final Approval Hearing;
- i. a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- j. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- k. the objector's signature (an attorney's signature is not sufficient).

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel, including taking depositions and propounding written discovery.

16. 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 benefit 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.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed Gary Klinger of Milberg Coleman Bryson Phillips Grossman PLLC and Jeff Ostrow of Kopelowitz Ostrow P.A. 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.

18. How will the lawyers be paid?

Class Counsel will file an Application for Attorneys' Fees, Costs and Service Awards for an award of attorneys' fees up to one-third of the Settlement Fund, plus reimbursement of costs. 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 shall apply to the Court for Service Awards for the Class Representatives of up to \$2,500 each, from the Settlement Fund.

Any attorneys' fees, costs and Service Award payments must be approved by the Court. The Court may award less than the amounts requested.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at **XX a./p.m. CT on <<DATE>>** at the United States District Court for the Northern District of Illinois, Eastern Division, **XXXXXXXXXX**, Chicago, Illinois, **XXXXXX** as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, adequate, and reasonable. 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. 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.XXXX.com**, or calling **(XXX) XXX-XXXX**.

20. 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 15, the Court will consider it.

21. 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 pursuant to the instructions in Question 15, including by providing all required information. Your objection must be mailed to the Clerk of the Court, Class Counsel, Defendant's Counsel, and the Settlement Administrator, at the mailing addresses listed above, postmarked by no later than **<<DATE>>**.

IF YOU DO NOTHING

22. What happens if I do nothing?

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

ADDITIONAL INFORMATION

23. 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.XXX.com. You may also call the Settlement Administrator with questions or to receive a Claim Form at **(XXX) XXX-XXXX**.

24. 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, calling toll-free **(XXX) XXX-XXXX** or at the Contact page of the Settlement Website:

Settlement Administrator – **XXXXXX**
c/o Kroll Settlement Administration LLC
PO Box **XXX**
New York, NY **XXXXXX**

PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT, OR CLASS COUNSEL FOR INFORMATION ABOUT THE CLASS ACTION SETTLEMENT

Questions? Go to www.xxx.com or call (xxx) xxx-xxxx