

# Exhibit E

To:  
From:  
Subject: Lee University Data Breach Settlement

**Were you notified that your Private Information may have been compromised in a Data Breach that Lee University experienced on or around March 22, 2024? A proposed class action settlement may affect your rights.**

A Settlement has been reached with Lee University, the Defendant in a class action lawsuit about a cybersecurity incident that occurred on or around March 22, 2024 (the “Data Breach.”) Defendant denies all Plaintiffs’ claims and maintains that it did not do anything wrong.

**Am I included?** You are receiving this Notice because Defendant’s records identify you are included in the Settlement Class. The Settlement Class consists of all persons whose Private Information may have been compromised in the Data Breach that was discovered on or around March 22, 2024, including those who received notice of the Data Breach from Defendant.

**What does the Settlement provide?** If approved by the Court, Defendants will pay \$1,750,000 to resolve the Settlement.

The Settlement will provide one (1) year of one-bureau Credit Monitoring Services to all Settlement Class Members who submit a timely and Valid Claim for Credit Monitoring Services. Even if Settlement Class Members previously accepted the Defendant’s offer of complimentary Credit Monitoring Services, they may still claim this benefit.

The Settlement will also provide Cash Payments to people who submit timely and Valid Claim.

There are two types of payments that are available to Settlement Class Members:

- (1) Cash Payment A – Documented Losses which provides reimbursement of up to \$5,000 in out-of-pocket losses per claimant, subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims; and
- (2) Cash Payment B – Cash Payment which consists of an estimated \$100 payment subject to a *pro rata* (proportional) adjustment depending upon the number of Valid Claims.

**How do I get the Settlement Class Member Benefits?** You must file a Claim Form online at [www.\[website\].com](http://www.[website].com), or print a Claim Form from the Settlement Website and mail it to the address on the form by **Month XX, 202X**.

**What are my other options?** If you do nothing, you will not receive any Settlement Class Member Benefits, you will remain a member of the Settlement Class and you will give up your rights to sue the Defendant for the claims resolved by this Settlement. If you do not want any Settlement Class Member Benefits but you want to keep your right to sue the Defendants for the claims resolved by this Settlement, you must opt out of the Settlement. If you do not opt out of the Settlement, you may object to it and ask the Court for permission to speak at the Final Approval Hearing. The Opt-Out and Objection Deadline under the Settlement is **Month XX, 202X**.

**The Court's Final Approval Hearing.** The Court will hold a hearing on **Month XX, 202X** << time ET>> to decide whether to approve the Settlement, up to \$583,333.33 in attorneys' fees and expenses and \$2,500 Service Award payments to each of the Class Representatives. If approved, these amounts will be paid from the Settlement Fund before calculating and distributing Settlement Class Member Benefits to Settlement Class Members who submit Valid Claims.

**Want more information?** Visit [www.\[website\].com](http://www.[website].com) for complete details about the Settlement and how to act on your rights and options, including how to file a Claim Form, object, and opt-out of the Settlement. You may also call **(xxx) xxx-xxxx** for more information.