

# Exhibit E

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

United States District Court for the Eastern District of Pennsylvania  
*Hasson v. Comcast Cable Communications, LLC*, No. 2:23-cv-05039-JMY

**Were you notified that your personal information may have been compromised by the October 2023 Comcast Data Breach? You may be eligible for 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.*

- A proposed Settlement has been reached with Comcast Cable Communications, LLC, and Comcast Corporation (collectively, “Comcast”), in a class action lawsuit regarding a cybersecurity incident that occurred in October 2023, in which a third-party gained unauthorized access to customers’ personal information (the “Data Breach”). Comcast denies that it engaged in any wrongdoing or violated any law.
- You are included in this Settlement as a Settlement Class Member if you were sent a notice of the Data Breach on or around December 18, 2023 informing you that your personal information may have been compromised.
- The proposed Settlement requires Comcast to establish a Settlement Fund of \$117,500,000 to cover cash payments to Settlement Class Members, reimbursement for documented out-of-pocket losses and lost time, and the cost of Identity Defense Services and Restoration Services, as well as notice and administrative costs, and court-approved attorneys’ fees and expenses, and Service Awards.
- As a Settlement Class Member, your rights are affected whether you act or do not act. Please read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>File a Claim</b>	You must submit a Claim Form to receive reimbursement for Out-of-Pocket Losses and/or Lost Time, or an Alternative Cash Payment. See Question X. As an automatic benefit, Settlement Class Members have been provided with an enrollment code for Identity Defense Services and Restoration Services that can be used after the Settlement becomes final.	<b>Month __, 2026</b>
<b>Exclude Yourself from the Settlement</b>	You can exclude yourself from the Settlement by informing the Settlement Administrator that you want to “opt out” of the Settlement. If the Settlement becomes final, this is the only option that allows you to retain your rights to separately sue for claims related to the Data Breach. If you opt out, you may not make a claim for benefits under the Settlement. See Question X.	<b>Month __, 2026</b>
<b>Object to the Settlement and/or Attend a Hearing</b>	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you do not like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for a Settlement payment. See Question X.	<b>Month __, 2026</b>
<b>Do Nothing</b>	If you do nothing, you will remain a Settlement Class Member and will give up the right to sue, continue to sue, or be part of another lawsuit against the Released Parties related to the legal claims resolved by this Settlement. You will not receive a Settlement payment, but you will be able to enroll in Identity Defense Services and Restoration Services after the Settlement becomes final.	No Deadline

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement.

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## BASIC INFORMATION

### **1. Why was this Notice issued?**

A Court authorized this Notice because you have a right to know about the proposed Settlement of this Action and about all your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *Hasson v. Comcast Cable Communications, LLC*, Case No. 2:23-cv-05039-JMY and is pending in the United States District Court for the Eastern District of Pennsylvania. The people who filed this Action are called the Plaintiffs and the companies they sued, Comcast Cable Communications, LLC, Comcast Corporation, Citrix Systems Inc., and Cloud Software Group Inc., are called the Defendants.

### **2. What is this Action about?**

On December 18, 2023, Comcast announced that it had been the victim of a third-party, criminal cyberattack between October 16, 2023, and October 19, 2023, in which the attackers were able to gain unauthorized access to customers' personal information. The Action alleges that Comcast failed to properly protect personal information in accordance with its duties, had inadequate data security, was unjustly enriched by the use of personal data of the impacted individuals, violated the federal Cable Act, 47 U.S.C. § 521 *et seq.*, violated certain state consumer statutes and other laws, and improperly or inadequately notified potentially impacted individuals. Comcast denies that it engaged in any wrongdoing or violated any law and denies liability.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as "Class Representatives" or "Plaintiffs." Together, the people included in the class action are called a "Settlement Class" or "Settlement Class Members." One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called "opting out") from a settlement. In this Settlement, the Class Representatives are Patricia Andros, Michelle Birnie, Jessica Durham, Ryan Emmett, Vince Estevez, Alexander Nunn, Steven Prescott, Robert Smith, Veronica Verdier, Marcia Proto Wilson, and Jodi Wolfson.

### **4. Why is there a settlement?**

The Court has not decided in favor of the Plaintiffs or Defendants. The Defendants deny all claims and contend that they have not violated any laws. The Plaintiffs and Defendants agreed to a settlement to avoid the costs and risks of a trial and, through the Settlement, Settlement Class Members are eligible to claim a payment and other benefits. The Plaintiffs and their attorneys, who also represent Settlement Class Members, believe the Settlement is in the best interests of all Settlement Class Members.

## WHO IS IN THE SETTLEMENT?

### **5. Who is included in the Settlement?**

The Settlement Class consists of all persons residing in the United States and its territories who were sent individual notification of the Data Breach, which occurred in October 2023, and was publicly disclosed by Comcast in December 2023.

## 6. Are there exceptions to being included in the Settlement?

Yes, excluded from the Settlement Class are: (i) Comcast, any entity in which Comcast has a controlling interest, and Comcast's officers, directors, employees, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Action and the members of their immediate families and judicial staff; (iii) any individual who timely and validly opts out of the Settlement; and (iv) all individuals who, on or before the filing of Plaintiffs' Motion for Preliminary Approval, either (1) filed a written arbitration demand or petition against Comcast relating to the Data Breach but have not signed a release of their claims against the Released Parties, (2) provided written notice to Comcast that they are currently represented by counsel for an arbitration claim related to the Data Breach but have not signed a release of their claims against the Released Parties, or (3) released their claims against the Released Parties.

## THE SETTLEMENT CLASS MEMBER BENEFITS

### 7. What does the Settlement provide?

If approved by the Court, Comcast will pay \$117,500,000 into a Settlement Fund to resolve the Settlement. The Settlement Fund will be used to pay:

- Notice and Administrative Costs;
- Attorneys' Fees and Expenses approved by the Court;
- Service Awards to the Class Representative, approved by the Court; and
- Settlement Benefits as provided for in the Comcast Consumer Settlement Benefits Plan, which includes reimbursement for Out-of-Pocket Losses and Lost Time, Alternative Cash Payments, and Identity Defense Services and Restoration Services.

To the extent total valid claims are greater than or less than the Net Settlement Fund, all valid claims (including Alternative Cash Payments) will be adjusted upward or downward on a proportional (*pro rata*) basis. More detailed information on these commitments and the Comcast Consumer Settlement Benefits Plan is provided in the Settlement Agreement, which is available at [www.\[website\].com](http://www.[website].com).

### 8. Tell me more about reimbursement for Out-of-Pocket Losses and Lost Time.

Settlement Class Members may choose to file a claim for reimbursement of documented Out-of-Pocket Losses and/or up to five (5) hours of Lost Time as described below:

(1) **Out-of-Pocket Losses:** If you spent money to deal with fraud or identity theft that you reasonably believe was "fairly traceable" (as defined in the Claim Form) to the Data Breach, or to protect yourself from future harm as a result of the Data Breach, then you can submit a claim for reimbursement. Out-of-Pocket Losses that are eligible for reimbursement may include, without limitation, the following:

- unreimbursed costs, expenses, losses, or charges incurred as a result of identity theft or identity fraud, falsified tax returns, or other alleged misuse of a Settlement Class Member's personal information;
- costs incurred on or after October 16, 2023, associated with placing or removing a credit freeze on a Settlement Class Member's credit file with any credit reporting agency;
- other miscellaneous expenses incurred on or after October 16, 2023, related to any Out-of-Pocket Loss such as notary, fax, postage, copying, mileage, and long-distance telephone charges;

- costs of credit reports, credit monitoring, or other products related to detection or remediation of identity theft incurred on or after October 16, 2023, through the date of the Settlement Class Member's claim submission.

To file a claim for Out-of-Pocket Losses, you must submit a valid Claim Form by **Month X, 2026**, choosing to receive the Out-of-Pocket Losses benefit, including an attestation regarding any actual and unreimbursed losses made under penalty of perjury and providing "Reasonable Documentation" supporting your claim (e.g., credit card statements, bank statements, invoices, telephone records, and receipts). **“Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement but can be considered to add clarity to or support other submitted documentation.**

(2) **Lost Time:** If you spent time dealing with fraud, identity theft, or other misuse of your personal information that you believe was "fairly traceable" to the Data Breach and spent time taking preventative measures to avoid such losses, you may submit a claim for Lost Time. Lost Time will be paid at a Reimbursement Rate of **\$30 per hour for up to five (5) hours** in 15-minute increments.

To file a claim for Lost Time, you must submit a valid Claim Form by **Month X, 2026**, choosing to receive the Lost Time benefit, including an attestation regarding: (i) any fraud, identity theft, or other alleged misuse of your personal information which you believe was "fairly traceable" to the Data Breach, or any preventive measures you took to avoid such fraud, identity theft, or other misuse, and (ii) the amount of time that you spent remedying this misuse or on preventative measures with a self-certified explanation of how you spent that time.

Settlement Class Members making a claim for Out-of-Pocket Losses and/or Lost Time are subject to a **total payment cap of up to \$10,000** and are entitled to the greater payment amount of the approved claim for Out-of-Pocket Losses and Lost Time, or the Alternative Cash Payment (see Question X) under the provisions outlined in the Settlement Agreement. See Question X for more information on how claim payments will be calculated.

## 9. Tell me more about the Alternative Cash Payment.

As an alternative to making a claim for Out-of-Pocket Losses and Lost Time, Settlement Class Members may request an Alternative Cash Payment, estimated in the amount of **\$50** subject to *pro rata* adjustment. To file claim for an Alternative Cash Payment, you must submit a valid Claim Form by **Month X, 2026**.

## 10. Tell me more about the Identity Defense Services and Restoration Services.

Settlement Class members are entitled to three years of CyEx Financial Shield Complete, which provides: 1-bureau credit monitoring; dark web monitoring; real-time authentication alerts; high-risk transaction monitoring; lost wallet protection; \$1 million in identity theft insurance; security freeze assistance; victim assistance; financial transaction monitoring; monthly credit score tracking; fictitious identity monitoring; bank & financial account monitoring; address change monitoring; home title monitoring; and access to trained customer service agents to assist class members respond to suspicious activity.

Settlement Class Members do not need to submit a Claim Form to receive Identity Defense Services and Restoration Services. Settlement Class Members are automatically eligible to enroll in Identity Defense Services and Restoration Services. Individualized enrollment codes have been provided on the email and/or mailing sent to each Settlement Class Member. To pre-enroll in this service, visit **<<Enrollment Link>>** and enter your activation code. Once the settlement is final, Settlement Class Members who (1) pre-enroll in this service will be sent an email from CyEx with a link explaining how to complete enrollment and activate the service or (2) do not pre-enroll in Identity Defense Services and Restoration Services will be sent an email from the Settlement Administrator containing their enrollment code and

instructions regarding how to complete enrollment and activate the service. If you did not receive an email regarding this Settlement, you may provide your email address to the Settlement Administrator via the Settlement Website.

## 11. How will Settlement Payments be calculated?

After deducting Notice and Administrative Costs, Attorneys' Fees and Expenses, the Service Award, and the costs associated with Identity Defense Services and Restoration Services, the balance of the Settlement Fund (the "Net Settlement Fund") will be used to pay all approved claims for Out-of-Pocket Losses, Lost Time, and Alternative Cash Payments. Payment amounts may be adjusted based on the amount remaining in the Net Settlement Fund on a *pro rata* (proportional) basis. Detailed information is available in Section 8 of the Comcast Consumer Settlement Benefits Plan.

## 12. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Released Parties about any of the legal claims this Settlement resolves. The Releases section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at [www.\[website\].com](http://www.[website].com).

## HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS - MAKING A CLAIM

### 13. How do I submit a Claim Form and get Settlement Class Member Benefits?

To file a claim for Out-of-Pocket Losses, Lost Time, Alternative Cash Payment, and/or Identity Defense Services, you must submit a Claim Form by **Month X, 2026**. Claim Forms may be submitted online at [www.\[website\].com](http://www.[website].com) by 11:59 p.m. ET, or mailed postmarked by **Month X, 2026** to the Settlement Administrator at:

*Hasson v. Comcast Cable Communications LLC*  
c/o Kroll Settlement Administration LLC  
P.O. Box **XXXX**  
New York, NY 10150-XXXX

*Reminder:* More information about how to request Restoration Services will be provided after the Court grants Final Approval of the Settlement via the Settlement Website, [www.\[website\].com](http://www.[website].com).

## 14. When will I get my Settlement Class Member Benefits?

The short answer is – after the Settlement is "finally approved" and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **Month XX, 2026**. If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Class Member Benefits will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

## THE LAWYERS REPRESENTING YOU

### 15. Do I have a lawyer in this case?

Yes, the Court appointed Gary F. Lynch of Lynch Carpenter LLP and Norman E. Siegel of Stueve Siegel Hanson LLP as Co-Lead Counsel, and James A. Francis of Francis Mailman Soumilas, P.C. and Charles E. Schaffer of Levin Sedran & Berman LLP as Co-Liaison Counsel. These attorneys represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will be paid from the Settlement Fund.

If you want to be represented by your own lawyer, you may hire one at your own expense.

## 16. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Co-Lead Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

## 17. How will the lawyers be paid?

Co-Lead Counsel will ask the Court to approve attorneys' fees up to one-third of the Settlement Fund (\$      ) plus reimbursement of litigation expenses, as well as a \$5,000 Service Award payment to each of the Class Representatives. Once filed, you may review Co-Lead's Counsel's motion for attorneys' fees, reimbursement of expenses, and service awards on the Settlement Website. If approved, these amounts will be paid from the Settlement Fund before making payments to Settlement Class Members who submit valid Claim Forms.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

### 18. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue Comcast about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The Opt-Out Deadline to submit a "Request for Exclusion" from the Settlement is **Month X, 2026**.

**To exclude yourself from the Settlement, you must submit a written Request for Exclusion to the Settlement Administrator that includes the following information:**

- The case name and number, "*Hasson v. Comcast Cable Communications LLC*, No: 2:23-cv-05039";
- Your name and address;
- A statement indicating that you want to be excluded from the Settlement Class, such as "I request to be excluded from the proposed Settlement Class in *Hasson v. Comcast Cable Communications LLC*, No: 2:23-cv-05039."; and
- Your personal signature.

Your Request for Exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **Month XX, 2026**.

*Hasson v. Comcast Cable Communications LLC*  
c/o Kroll Settlement Administration LLC  
ATTN: Exclusion Request  
P.O. Box XXXX  
New York, NY 10150-XXXX

**ONLINE OPT-OUTS:** If you submit your opt-out online you must verify the request to opt-out no later than the Opt-Out Deadline using the link sent to the individual who submitted the request for exclusion.

**NOTE:** You may only seek exclusion for yourself. Opt-out requests seeking exclusion on behalf of more than one individual will be deemed invalid by the Settlement Administrator.

## **OBJECTING TO THE SETTLEMENT**

### **19. How do I tell the Court if I do not like the Settlement?**

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for attorneys' fees and expenses, or Service Award payments, the Releases provided to the Released Parties, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include:

- The case name and number (i.e., *Hasson v. Comcast Cable Communications LLC*, Case No. 2:23-cv-05039);
- Your name, address, and telephone number and, if represented by counsel, the name and address of your counsel;
- A statement of whether the objection applies only to you, to a specific subset of the class, or to the entire class;
- A statement of the number of times you (and, where applicable, your counsel) have objected to a class action settlement within the three years preceding the date of your objection, along with the caption of each case you have objected to;
- A statement of the specific grounds for the objection; and
- A statement indicating whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through counsel.
  - If you or your attorney intend to speak at the Final Approval Hearing, you must also include a detailed description of any evidence and copies of any exhibits you may introduce at the Final Approval Hearing. The Court will then decide whether to grant you or your attorney permission to speak at the Final Approval Hearing.

Objections must be filed with, or mailed to, the Court no later than **Month XX, 202X**.

James A. Byrne United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

### **20. What is the difference between objecting and opting out?**

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## **THE COURT'S FINAL APPROVAL HEARING**

### **21. When is the Court's Final Approval Hearing?**

The Court is scheduled to hold a Final Approval Hearing on **Month XX, 2026 at XX:X0 .m. ET**, at James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, Pennsylvania 19106, to decide whether to approve the Settlement, how much Settlement Attorneys' Fees and Expenses to award to Class Counsel for representing the Settlement Class, and whether to approve Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check [www.\[website\].com](http://www.[website].com) for updates.

**22. Do I have to come to the Final Approval Hearing?**

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

**IF YOU DO NOTHING****23. What happens if I do nothing at all?**

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Settlement and will not be eligible to receive a Settlement payment. You will, however, be able to activate Identity Defense Services and Restoration Services after the Settlement becomes final.

**GETTING MORE INFORMATION****24. How do I get more information?**

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement, Consumer Settlement Class Member Benefits Plan and other related documents are available at the Settlement Website, [www.\[website\].com](http://www.[website].com).

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (XXX) XXX-XXXX, or by mail:

*Hasson v. Comcast Cable Communications LLC*  
 c/o Kroll Settlement Administration LLC  
 P.O. Box XXXX  
 New York, NY 10150-XXXX

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANTS.**