

Exhibit C

To: [Class Member email address]
From: Sequoia Data Breach Settlement Administrator
Subject: Notice of Class Action Settlement – Sequoia Data Breach Litigation

Your Unique ID: <<RefNum>>

In re: Sequoia Benefits & Insurance Data Breach Litigation, No. 22-cv-08217-RFL (N.D. Cal.)

A Federal Court Authorized this Notice

This notice is to tell you about the settlement of a class action lawsuit, *In Re: Sequoia Benefits and Insurance Data Breach Litigation* brought on behalf of people whose personal information was stored on a cloud storage system that may have been accessed by an unauthorized third party on September 22, 2022 (the “Data Security Incident”). **You received this notice because you may be a member of the group of people affected, called the “Class.”** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

CLASS MEMBERS ARE ENTITLED TO MONEY AS PART OF THE \$8.7 MILLION SETTLEMENT.

This notice tells you how to submit a claim for cash payment or get more information about the Settlement. Learn more by visiting [\[website\]](#).

What are Your Options? Read this notice to understand the settlement and to determine if you are a class member.

OPTION 1: Submit a Claim form and Receive Cash Payment. You must submit a claim to receive payment. You will be bound by the settlement.

OPTION 2: Do Nothing. Get no payment. Give up rights resolved by settlement.

OPTION 3: Opt Out. Get no payment. Allows you to bring another lawsuit against Sequoia about the same issues at your own expense.

OPTION 4: Object. Tell the Court why you don’t like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

Who is Included. The Class includes all persons in the United States to whom Sequoia sent notice of the Data Security Incident. There is also a subclass that includes all California residents at the time of the Data Security Incident, which occurred between September 22 and October 6, 2022, to whom Sequoia sent notice of the Data Security Incident. There are approximately 584,109 individuals in the Class, of which approximately 210,673 were California residents at the time of the Data Security Incident.

What the Settlement Provides. The proposed Settlement creates a non-reversionary common fund in the amount of \$8,700,000.00 to pay all Class member benefits, attorneys' fees, litigation expenses, class representative service awards, and the cost of Settlement administration.

The Cash Benefits Available to Class Members.

- All members of the Class who submit a valid claim are entitled to a **cash payment projected to be \$75**.
- If you were a California resident between September 22 and October 6, 2022, you may be entitled to an additional **cash payment projected to be \$150**.

The amount of these payments will be adjusted up or down on a *pro rata* basis based on the money left in the common fund after the payment of other Class member benefits, attorneys' fees, litigation expenses, class representative service awards, and the cost of Settlement administration.

- Alternatively, if you suffered documented out of pocket losses or expenses as a result of the Data Security Incident, you may submit a claim to be reimbursed for those out-of-pocket losses or expenses in an **amount up to \$7,500**. As part of this benefit, if you suffered documented out of pocket losses or expenses, you can claim compensation for up to **4 hours of time spent** responding to the Data Security Incident at a rate of **\$30 dollars per hour**. Only Class members with documented losses or expenses are eligible to be compensated for lost time.

How To Get Benefits. You must submit a Claim Form, available at [WEBSITE](#). You will need the Unique ID number found at the top of this email to submit a Claim Form. The Claim Form must either be mailed and postmarked or submitted electronically on the website by [\[Claim Deadline Date\]](#).

Your Other Options. If you file a Claim Form, object to the Settlement, or do nothing, you will stay in the Class and be bound by its terms, including its release of claims. This means you will be bound by all orders of the Court and you will not be able to start, continue or be a part of any other lawsuit against Sequoia or related parties related to the Data Security Incident. The only way to preserve your right to file an independent lawsuit against Sequoia is to opt out.

How to Opt Out if You Don't Want Cash Benefits from this Lawsuit. You can opt out. If you do, you will not receive payment and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. To opt out of the Settlement, you must complete the opt out form available for download [here](#) and mail it by [\[date\]](#) to the Settlement Administrator at: [CONTACT INFORMATION](#)

How to Object if You Don't Like Something About the Settlement. If you disagree with any part of the Settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the Class, or the entire Class. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you. To object, you must submit an

objection to the Court either by filing it electronically or in person at any location of the United States District Court for the Northern District of California or by mailing it to the Class Action Clerk, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102 by **DATE**. Your objection must substantially comply with the following requirements:

(i) your full name and address; (ii) the case name and docket number – IN RE: SEQUOIA BENEFITS AND INSURANCE DATA BREACH LITIGATION, Case No. 3:22-cv-08217-RFL (N.D. Cal.); (iii) information identifying you as a Class Member, including proof that you are a Class Member (e.g., copy of your settlement notice, copy of original notice of the Data Security Incident, or a statement explaining why you believe you are a Class Member); (iv) a written statement of all grounds for the objection, accompanied by any legal support for the objection you believe applicable; (v) the identity of any and all counsel representing you in connection with the objection; (vi) a statement whether you and/or your counsel will appear at the Final Fairness Hearing; and (vii) your signature or the signature of your duly authorized attorney or other duly authorized representative (if any) representing you in connection with the objection.

The requirement to mail or file a written objection may be excused upon a showing of good cause.

The Final Fairness Hearing. The Court has scheduled a hearing for <<**FinalApprovalDate**>>, to decide whether to approve the Settlement; attorneys' fees, costs, and expenses; service awards; and any objections. If you object to the Settlement, you or your attorney may request permission from the Court to speak about your objection at the hearing.

The Attorneys for the Plaintiffs and the Proposed Class. The Court appointed David M. Berger, GIBBS MURA LLP; Rachele R. Byrd, WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP; M. Anderson Berry, CLAYEO C. ARNOLD A PROFESSIONAL LAW CORP.; and Kaleigh N. Boyd, TOUSLEY BRAIN STEPHENS PLLC. These lawyers (known as class counsel) negotiated this Settlement on your behalf. If you want to be represented by your own lawyer, you may hire one at your own expense.

You do Not Have an Obligation to Pay Attorneys' Fees or Expenses. Class Counsel's attorneys' fees and expenses will be paid from the Settlement Fund. You will not have to pay the lawyers directly. To pay for their time and risk in bringing this case without any guarantee of payment unless they were successful, Class Counsel will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$2,175,000.00 total in attorneys' fees plus the reimbursement of out-of-pocket expenses. Class Counsel's attorneys' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to Class Counsel's fees even if you think the Settlement terms are fair.

The Plaintiffs Will Request Additional Compensation. The Plaintiffs, also called the Class Representatives, who filed this lawsuit will seek service awards up to \$3,500 each (\$21,000 total) to be paid from the Settlement Fund as compensation for their time and effort on behalf of the Class.

More Information. This notice summarizes the proposed Settlement. For the precise terms of the Settlement, please see the Settlement Agreement available at [WEBSITE](#), contact Class Counsel at David M. Berger, GIBBS MURA LLP, 1111 Broadway, Suite 2100, Oakland, CA 9460, or access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE
TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**