

Exhibit D

<Mailing caption>

c/o Kroll Settlement Administration LLC
P.O. Box XXXX
New York, NY 10150-XXXX

FIRST-CLASS MAIL
U.S. POSTAGE PAID
CITY, ST
PERMIT NO. XXXX

24-cv-00757-E

Document 283-1

Filed 05/30/25

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ELECTRONIC SERVICE REQUESTED

Notice of Proposed Settlement of Class Action

*In Re: AT&T Inc. Customer Data Security
Breach Litigation*
MDL Docket No. 3:24-md-03114-E

If you are a living person in the United States whose Data Elements were included in the AT&T 1 Data Incident, announced on March 30, 2024, you are eligible to receive a Settlement Cash Member Benefit from a class action Settlement.

For more information, visit,
www.website.com

<<Refnum Barcode>>

CLASS MEMBER ID: <<Refnum>>

Postal Service: Please do not mark barcode

[FIRST NAME] [LAST NAME]
[COMPANY]
[ADDRESS 1]
[ADDRESS 2]
[CITY] [STATE] [ZIP][ZIP4]

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What is this about? On March 30, 2024, AT&T announced that AT&T-specific fields were contained in a data set released on the dark web ("AT&T 1 Data Incident"). Following AT&T's announcement of the AT&T 1 Data Incident, lawsuits were filed against AT&T in state and federal courts across the country. The lawsuits were consolidated before Judge Ada E. Brown in the Northern District of Texas in June 2024 (*In re AT&T Inc. Customer Data Sec. Breach Litig.*, No. "24-00757-E"). The parties to the Actions have agreed to a Settlement. Defendants do not admit knowledge, admission, or concealment of the allegations, and deny any fault or liability, or any charges of wrongdoing that have been or could have been asserted.

Who is a Settlement Class Member? You are an AT&T 1 Settlement Class member if you are a living person in the United States whose Data Elements were included in the AT&T 1 Data Incident that was announced on March 30, 2024.

What are the benefits? AT&T has agreed to make available a non-reversionary all cash fund of \$149,000,000 to pay: (i) Settlement Administration Costs, (ii) Service Awards approved by the Court, (iii) any amounts approved by the Court for Attorneys' Fees and Costs, and (iv) applicable taxes, if any. All AT&T 1 Settlement Class Members may make a Claim for:

- **Documented Loss Cash Payment** – Each AT&T 1 Settlement Class Member can seek a payment for documented losses that occurred in 2019 or later of up to \$5,000 per AT&T 1 Settlement Class Member, upon presentation of documented losses fairly traceable to the AT&T 1 Data Incident; **OR**
- **Cash Payment** – Instead of a Documented Loss Cash Payment, an AT&T 1 Settlement Class Member is eligible to make a Claim for a Tier 1 OR Tier 2 Cash Payment, which is a pro rata share of the AT&T 1 Net Settlement Fund, the amount of which depends upon which Tier you are in and the number of Valid Claims filed. For more information, visit the Settlement website [\[URL\]](#).

How to make a claim? To receive benefits from the Settlement, you must submit a Claim Form online at [\[URL\]](#) by [\[date\]](#) or by mail postmarked by [\[date\]](#) and mailed to the Settlement Administrator's address below.

What are my other rights?

- **Do nothing:** If you do nothing, you remain in the Settlement. You give up your rights to sue, but you will not get any money or benefits; you must submit a Claim Form to get money or benefits.
- **Exclude yourself:** You can get out of the Settlement and keep your right to sue about the claims in these Actions, but you will not get any money or benefits from the Settlement. You must submit a request for exclusion to the Settlement Administrator by [\[date\]](#).
- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be submitted by [\[date\]](#). Detailed instructions on how to file a Claim Form, exclude yourself, or object are on the Settlement Website at [\[URL\]](#). The Court will hold the Final Approval Hearing on [\[date\]](#) at [\[time\]](#) to consider whether to approve the Settlement, hear objections, determine if the Settlement is fair, and consider Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards, which are not to exceed \$1,500 per Class Representative. You may attend the hearing, but you don't have to.

This is only a summary. For additional information, including a copy of the Settlement Agreement, Long-Form Notice, and other documents, or to update your address, visit [\[URL\]](#) or call [\[phone\]](#). You may also contact the Settlement Administrator at [\[Mailing caption\]](#), c/o Kroll Settlement Administration LLC, P.O. Box [XXXX](#), New York, NY 10150-[XXXX](#).

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Class Member ID: <<Refnum>>

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VISIT THE SETTLEMENT WEBSITE BY
SCANNING THE PROVIDED QR CODE

POSTCARD CLAIM FORM

To submit a claim for a Tier 1 Cash Payment or Tier 2 Cash Payment, please complete the below form, sign, and mail this portion of the postcard to the Settlement Administrator by no later than **DATE** Note: Claims for Documented Loss Cash Payments require supporting documentation and therefore must be submitted online at www.website.com or mailed to the Settlement Administrator with a separate Claim Form.

Class Member ID: <<refnum>>

<<firstname>> <<lastname>>

<<Company>>

<<address1>> <<address2>>

<<City>>, <<State>> <<Zip>>

If different than the preprinted data on the left, please print your correct information:

First Name

MI

Last Name

Address

City

State

Zip Code

Email Address: _____ @ _____

Pro Rata Cash Payment

☐

Yes, I choose a *pro rata* Cash Payment, instead of a Documented Loss Cash Payment, based on the Settlement Class I am in and wish to Claim the *pro rata* Cash Payment I am eligible for.

SIGN AND DATE YOUR CLAIM FORM

I attest that the information supplied in this Claim Form by the undersigned is true and correct to the best of my recollection. I understand that I may be asked to provide supplemental information by the Claims Administrator before my claim will be considered complete and valid.

Signature: _____ Print Name: _____ Date (mm/dd/yy): _____ / _____ / _____

DEADLINE TO RETURN

DATE

<Mailing caption>

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*In Re: AT&T Inc. Customer Data Security
Breach Litigation*
MDL Docket No. 3:24-md-03114-E

If you are a living person in the United States whose Data Elements were included in the AT&T 1 and AT&T 2 Data Incidents, announced on March 30 and July 12, 2024, respectively, you are eligible to receive Settlement Cash Member Benefits from a class action Settlement.

For more information, visit,
www.website.com

<<Refnum Barcode>>

CLASS MEMBER ID: <<Refnum>>

Postal Service: Please do not mark barcode

[FIRST NAME] [LAST NAME]
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What is this about? On March 30, 2024, AT&T announced that AT&T-specific fields were contained in a data set released on the dark web ("AT&T 1 Data Incident"). Following AT&T's announcement of the AT&T 1 Data Incident, lawsuits were filed against AT&T in state and federal courts across the country. The lawsuits were consolidated before Judge Ada E. Brown in the Northern District of Texas in June 2024 (*In re AT&T Inc. Customer Data Sec. Breach Litig.*). On July 12, 2024, AT&T announced a second data incident where additional data had been released, allegedly unlawfully obtained from an AT&T workspace on a third-party cloud platform hosted by Snowflake, Inc. ("AT&T 2 Data Incident"). Lawsuits were consolidated before Judge Brian Morris in the District of Montana in October 2024 and captioned *In Re Snowflake, Inc. Data Breach Litigation*, MDL Docket No. 3:24-md-3126. The Parties to both Actions have agreed to enter a Settlement in the Northern District of Texas 2024 (*In re AT&T Inc. Customer Data Sec. Breach Litigation*). Defendants do not acknowledge, admit to, or concede any of the allegations, and deny any fault or liability, or any charges of wrongdoing that have been or could have been asserted.

Who is a Settlement Class Member? You are an AT&T 1 and AT&T 2 Settlement Class member if you are a living person in the United States whose Data Elements were included in the AT&T 1 and AT&T 2 Data Incidents that were announced on March 30 and July 12, 2024, respectively.

What are the benefits? AT&T has agreed to make available a non-reversionary all cash fund of \$149,000,000 and a non-reversionary \$28,000,000 all cash payment to pay: (i) Settlement Administration Costs, (ii) Service Awards approved by the Court, (iii) any amounts approved by the Court for Attorneys' Fees and Costs, and (iv) applicable taxes, if any out of the respective funds. All AT&T 1 and AT&T 2 Settlement Class Members may make a Claim for:

- **Documented Loss Cash Payment** – Each AT&T 1 Settlement Class Member can seek a payment for documented losses that occurred in 2019 or later of up to \$5,000 upon presentation of documented losses fairly traceable to the AT&T 1 Data Incident and each AT&T 2 Settlement Class Member can seek a payment for up to \$2,500.00 for losses that occurred on or after April 14, 2024 that are fairly traceable to the AT&T 2 Data Incident upon presentation of documented losses fairly traceable to the AT&T 2 Data Incident; **OR**
- **Cash Payment** – Instead of a Documented Loss Cash Payment, Settlement Class Members are eligible to make a Claim for a Tiered Cash Payment, which is a *pro rata* share of the AT&T 1 Net Settlement Fund, the amount of which depends upon which Tier you are in and the number of Valid Claims filed. For more information, visit the Settlement website [[URL](#)].

How to make a claim? To receive benefits from the Settlement, you must submit a Claim Form online at [[URL](#)] by [[date](#)] or by mail postmarked by [[date](#)] and mailed to the Settlement Administrator's address below.

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- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be submitted by [[date](#)]. Detailed instructions on how to file a Claim Form, exclude yourself, or object are on the Settlement Website at [[URL](#)]. The Court will hold the Final Approval Hearing on [[date](#)] at [[time](#)] to consider whether to approve the Settlement, hear objections, determine if the Settlement is fair, and consider Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards, which are not to exceed \$1,500 per Class Representative. You may attend the hearing, but you don't have to.

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Class Member ID: <<refnum>>

<<firstname>> <<lastname>>

<<Company>>

<<address1>> <<address2>>

<<City>>, <<State>> <<Zip>>

If different than the preprinted data on the left, please print your correct information:

First Name

MI

Last Name

Address

City

State

Zip Code

Email Address: _____ @ _____

Pro Rata Cash Payment

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Yes, I choose a *pro rata* Cash Payment, instead of a Documented Loss Cash Payment, based on the Settlement Class I am in and wish to Claim the *pro rata* Cash Payment I am eligible for.

SIGN AND DATE YOUR CLAIM FORM

I attest that the information supplied in this Claim Form by the undersigned is true and correct to the best of my recollection. I understand that I may be asked to provide supplemental information by the Claims Administrator before my claim will be considered complete and valid.

Signature: _____ Print Name: _____ Date (mm/dd/yy): _____ / _____ / _____

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