

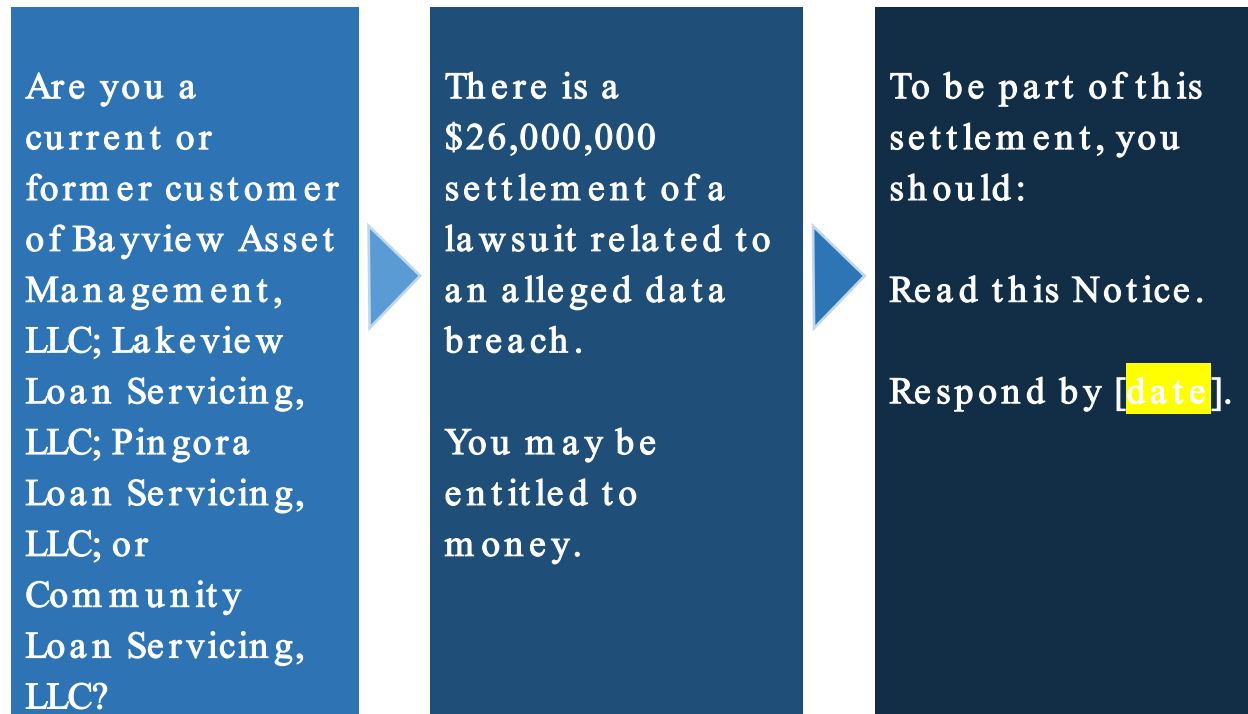
Exhibit D



United States District Court, Southern District of Florida
In re LAKEVIEW LOAN SERVICING DATA BREACH LITIGATION
Case No. 1:22-cv-20955-GAYLES/TORRES

Class Action Notice

Authorized by the Southern District of Florida



Important things to know:

- If you take no action and are a Settlement Class Member, you will still be bound by the settlement, and your rights will be affected. ***Please read this Notice carefully and completely.***
- You can learn more at: [website].

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About This Notice

Why did I get this Notice?

This Notice is to tell you about the settlement of two class action lawsuits, *In re Lakeview Loan Servicing Data Breach Litigation*, pending in the United States District Court for the Southern District of Florida, and *Lazarus v. Lakeview Loan Servicing, LLC*, pending in the California Superior Court for Sacramento County. A proposed settlement has been reached in the lawsuits involving Bayview Asset Management, LLC, Lakeview Loan Servicing, LLC, Pingora Loan Servicing, LLC, and Community Loan Servicing, LLC (collectively, “Defendants”) relating to the alleged unauthorized access to certain files stored on Defendants’ systems, which may have included personal information (the “Incident”). **You received this Notice because you may be a member of the group of people who received notice of the Incident, called the “Settlement Class.”** This Notice gives you a summary of the terms of the proposed Settlement Agreement, explains what rights Settlement Class Members have, and helps Settlement Class Members make informed decisions about what action to take.

What do I do next?

Read this Notice to understand the settlement and to determine if you are a Settlement Class Member. Then, decide if you want to:

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	<p>The only way to receive benefits from this settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at www.[Settlement Website].com.</p>	_____, 2026
OPT OUT OF THE SETTLEMENT	<p>You can choose to opt out of the settlement and receive no benefits. This is the only option that potentially allows you to ever be part of any other lawsuit against Defendants or any other Released Parties about the legal claims related to the issues raised in this Litigation, subject to any defenses Defendants may have to such</p>	_____, 2026

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
	claims, including the statutes of limitations. You can hire your own legal counsel at your own expense.	
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the settlement, you may object to it by writing to the Court about why you don't like the settlement. You may also object to Class Counsel's attorneys' fees and expense request, and ask the Court for permission to speak about your objection at the Final Fairness Hearing.	[REDACTED], 2026
DO NOTHING	Unless you opt out of the settlement, you are automatically part of the settlement. If you do nothing, you will not receive benefits from this settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against Defendants related to the legal claims resolved by this settlement.	No Deadline

The Court in charge of this case still has to decide whether to approve the settlement.

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

What are the most important dates?

Your deadline to object or opt out: [date]

Settlement approval hearing: [date]

Your deadline to submit a Claim Form: [date]

Basic Information

What is this lawsuit about?

This lawsuit concerns the alleged unauthorized access to certain files stored on Defendants' systems, which may have included personal information. Defendants deny all claims alleged against them and deny all charges of wrongdoing or liability. The settlement is not an

admission of wrongdoing or an indication that Defendants have violated any laws, but rather the resolution of disputed claims.

What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are known as “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “class” or “class members.” One court resolves the lawsuit for all class members, except for those who opt out of the settlement.

Why is there a settlement?

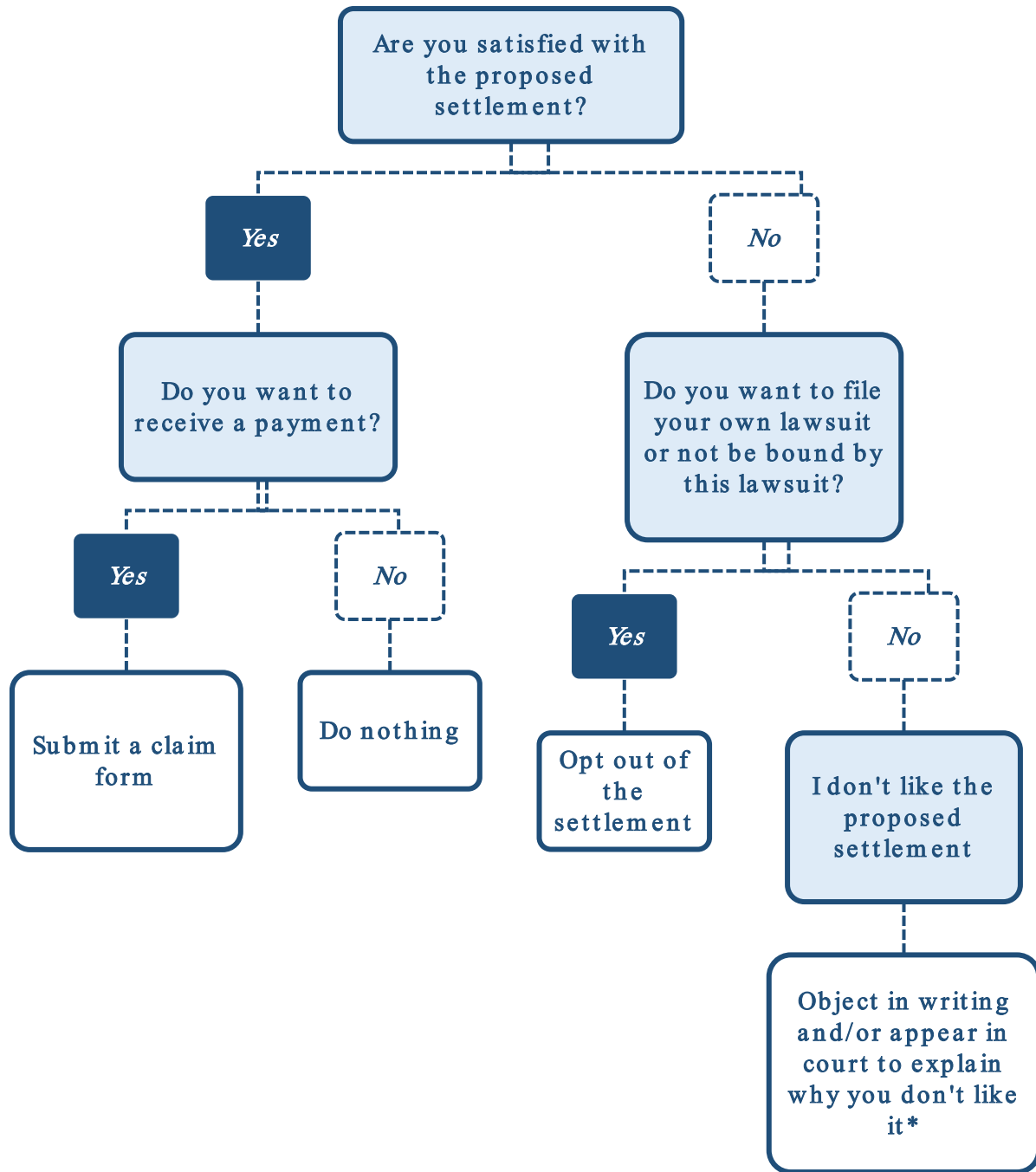
The Court did not decide in favor of Plaintiffs or Defendants. Plaintiffs and Defendants have agreed to a settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the settlement. Plaintiffs and their attorneys think the settlement is best for all Settlement Class Members.

How do I weigh my options?

You have four options. You can stay in the settlement and submit a claim, you can opt out of the settlement, you can object to the settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim	Opt Out	Object	Do Nothing
Can I receive settlement money if I . . .	YES	NO	YES	NO
Am I bound by the terms of the settlement if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

What is the best path for me?



**You can object to the settlement AND submit a Claim Form to receive payment, but you must submit a Claim Form to receive payment.*

Who is in the settlement?

Who is included in the settlement?

The Settlement Class is defined as: All persons who were sent notice from any Defendant that their Personally Identifiable Information (“PII”) was potentially accessed during the Incident. Additionally, California Settlement Class means all Settlement Class Members who resided in California on October 11, 2021, the time of the Incident. For avoidance of doubt, all members of the California Settlement Class are also members of the Settlement Class.

Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (i) Defendants and their respective officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) the Judge and/or Magistrate assigned to evaluate the fairness of this settlement; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the Incident or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator by mail, email, or by calling toll-free.

Lakeview Data Incident Settlement
c/o Settlement Administrator
[ADDRESS]
info@[SettlementWebsite].com
1-XXX-XXX-XXXX

You may also view the Settlement Agreement at
[www.\[SettlementWebsite\].com](http://www.[SettlementWebsite].com).

The Settlement Benefits

What does the settlement provide?

The settlement provides for the creation of a \$26,000,000.00 Settlement Fund to pay for: (i) Notice and Administration Expenses; (ii) Fee and Expense Award and Service Awards, as approved and awarded by the Court; (iii) documented Out-of-Pocket Loss Payments; (iv) *Pro Rata* Cash Payments; and (v) California *Pro Rata* Cash Payments. The settlement benefits are summarized below. Visit [WEBSITE](#) for a full description of these benefits.

Settlement Class Members may submit claims for compensation for Out-of-Pocket Losses, and either a *pro rata* payment or a two-times *pro rata* payment for California Settlement Class Members in recognition of the protections afforded to California residents by the California Consumer Privacy Act.

Compensation for Out-of-Pocket Losses. Participating Settlement Class Members can claim up to a total of \$5,000 per person for out-of-pocket losses incurred as a result of the Incident, including, without limitation: (i) costs, expenses, losses, or charges incurred as a result of identity theft or identity fraud or other misuse of a Settlement Class Member's PII after October 11, 2021; (ii) costs incurred on or after October 11, 2021, associated with accessing or freezing/unfreezing credit reports with any credit reporting agency; (iii) miscellaneous expenses such as notary, postage, copying, mileage, and other charges; and (iv) charges for credit monitoring or other mitigative expenditures incurred on or after October 11, 2021, through the issuance of this Class Action Notice. Out-of-Pocket Loss Payment Claims are subject to *pro rata* reduction if all valid Out-of-Pocket Loss Payment Claims exceed \$5,000,000.

Settlement Class Members submitting claims for Out-of-Pocket Loss Payments must submit documentation and an attestation supporting their claims. This can include receipts or other documentation that document the costs incurred but does not include documentation that is "self-prepared" by the claimant. "Self-prepared" documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support to other submitted documentation. The attestation must state that the monetary losses are fairly traceable to the Incident and were not incurred due to some other event or reason.

Cash Fund Payment. All Settlement Class Members are eligible to make a claim for a *pro rata* cash fund payment estimated to be \$[]

per valid claimant. After payment of Notice and Administration Expenses, Service Awards, and any Fee and Expense Award from the Settlement Fund, the *pro rata* cash fund payments will evenly distribute the remaining amount of the Net Settlement Fund to each Settlement Class Member who submits a timely and Valid Claim for out-of-pocket losses before calculating any *Pro Rata* Cash Payments.

California Settlement Class Payment. Settlement Class Members who resided in California at the time of the Incident may claim an additional *Pro Rata* Cash Payment in recognition of their claims under the California Consumer Privacy Act. For purposes of clarity, this means that they can receive a total of two *Pro Rata* Cash Payments. To recover an additional *Pro Rata* Cash Payment, California Settlement Class Members must verify that they resided in California at the time of the Incident (October 11, 2021) by submitting their name, address, and an attestation under penalty of perjury that they were residents of California at the time of the Incident.

Monitoring Services. Settlement Class Members may claim and enroll in up to one year of Monitoring Services provided by CyEx through its Financial Shield Total product.

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 Defendants about any of the legal claims this settlement resolves. The “Mutual Releases” section of the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available for review at [www.\[SettlementWebsite\].com](http://www.[SettlementWebsite].com).

Submitting a Claim Form for Settlement Benefits

How do I submit a claim for a settlement benefit?

The fastest way to submit your Claim Form is online at [www.\[SettlementWebsite\].com](http://www.[SettlementWebsite].com). If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at:

Lakeview Data Incident Settlement

Attn: Claims

[ADDRESS]

You may also contact the Settlement Administrator to request a Claim Form by calling toll-free 1-XXX-XXX-XXXX, by emailing [info@\[SettlementWebsite\].com](mailto:info@[SettlementWebsite].com), or by writing to the address above.

What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by [Claims Deadline]. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is postmarked no later than [Claims Deadline].

When will the settlement benefits be issued?

The Court will hold a Final Fairness Hearing on _____, 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 benefits will be distributed if the Court grants final approval of the settlement and after any appeals are resolved, or after the period to seek an appeal has expired.

The Lawyers Representing You

Do I have a lawyer in the case?

Yes, the Court appointed John A. Yanchunis of Morgan & Morgan Complex Litigation Group, Stuart A. Davidson of Robbins Geller Rudman & Dowd LLP, Adam E. Polk of Girard Sharp LLP, Gary M. Klinger of Milberg, PLLC, Julie Braman Kane of Colson Hicks Eidson, P.A., and M. Anderson Berry of Emery Reddy PC, to represent you and other Settlement Class Members as Class Counsel.

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MORGAN & MORGAN COMPLEX LITIGATION GROUP
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: 813-223-5505

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Seattle, WA 98101-1269
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Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want to be

represented by your own lawyer, you may hire one at your own expense.

How will Class Counsel be paid?

Class Counsel will file a Fee Application for an award of attorneys' fees and expenses to be paid from the Settlement Fund of up to one-third of the Settlement Fund.

Class Counsel's Fee Application will be available at [www.\[SettlementWebsite\].com](http://www.[SettlementWebsite].com) after it is filed with the Court.

Excluding Yourself from the Settlement

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, if any, to separately sue Defendants about the legal issues in this case (subject to any defenses Defendants may have to such a suit, including the statutes of limitations), there are steps that you must take to exclude yourself from the Settlement Class. This is called requesting an exclusion from, or "opting out" of the Settlement Class. The deadline to submit a request for exclusion from the settlement is [\[Opt-Out Deadline\]](#).

To exclude yourself from the settlement, you must submit a written request for exclusion that includes the following information:

- (i) the name of the proceedings: *In re Lakeview Loan Servicing Data Breach Litigation*, Case No. 1:22-cv-20955, pending in the United States District Court, Southern District of Florida;
- (ii) Settlement Class Member's full name;
- (iii) current mailing address;
- (iv) personal signature; and
- (v) the words "Request for Exclusion" or a comparable statement that the individual does not wish to participate in the settlement, or some other clear manifestation of the intent to opt out of the settlement.

Your request for exclusion must be mailed to the Settlement

Administrator at the address below, **postmarked no later than [Opt-Out Deadline]**.

Lakeview Data Incident Settlement
ATTN: Exclusion Request
[ADDRESS]

If you exclude yourself, you are telling the Court that you do not want to be part of the settlement. You will not be eligible to receive any settlement benefits if you exclude yourself.

You may only exclude yourself—not any other person. **Any Settlement Class Member who does not file a timely request for exclusion in accordance with this section will lose the opportunity to exclude himself or herself from the settlement and will be bound by the settlement.**

Commenting on or Objecting to the Settlement

How do I tell the Court if I like or do not like the settlement?

If you are a Settlement Class Member and you do not like the settlement, you can object to it, if you choose. You can give reasons why you think the Court should not approve it. The Court will consider your views.

For an objection to be a valid objection under the settlement, it must include or substantially comply with the following: (i) the name of the proceeding; (ii) the Settlement Class Member's full name, current mailing address, email address, and telephone number; (iii) a statement of the specific grounds for the objection, as well as any documents supporting the objection, and whether the objection applies to the objector, a subset of the Settlement Class, or the entire Settlement Class; (iv) the identity of any attorneys representing the objector; (v) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; (vi) a statement identifying all class action settlements objected to by the Settlement Class Member or his or her counsel; and (vii) the signature of the Settlement Class Member or the Settlement Class Member's attorney. The Court, in its discretion, may authorize additional discovery of objectors.

To be timely, an objection must be mailed to Settlement Administrator, so it is postmarked no later than [OBJECTION DATE].

Lakeview Data Incident Settlement
ATTN: Objection
[Address]

What is the difference between objecting and excluding?

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 the settlement. Excluding yourself from the settlement is opting out and stating to the Court that you do not want to be part of the settlement. If you opt out of the settlement, you cannot object to it because the settlement no longer affects you.

The Court's Final Fairness Hearing

When is the Court's Final Fairness Hearing?

The Court will hold a Final Fairness Hearing on [DATE] at [TIME], in Courtroom XXX of the [Court Address].

At the Final Fairness Hearing, the Court will consider whether to approve the settlement, Class Counsel's Fee Application, and application for Service Awards. The Court will also consider any objections to the settlement that were submitted in accordance with the requirements outlined above.

If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost (*see above*).

The date and time of this hearing may change without further notice. Please check [www.\[SettlementWebsite\].com](http://www.[SettlementWebsite].com) for updates.

Do I have to come to the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an objection, you do not have to come to the Final Fairness Hearing to talk about it.

If you file your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary.

If I Do Nothing

What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights described in **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against Defendants and the Released Parties about the legal issues resolved by this settlement. In addition, if you do nothing, you will not receive any benefits from this settlement.

Getting More Information

How do I get more information?

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

If you have additional questions, you may contact the Settlement Administrator by mail, email, or by calling toll-free.

Lakeview Data Incident Settlement

[ADDRESS]

[info@\[SettlementWebsite\].com](mailto:info@[SettlementWebsite].com)

1-XXX-XXX-XXXX

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, [Address].

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING QUESTIONS ABOUT THIS SETTLEMENT.