

Exhibit D

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Southern District of New York
In re Lemonade, Inc. Data Disclosure Litigation, Case No. 1:25-cv-04106-JHR-KHP

Were you notified that your Personal Information may have been compromised in an unauthorized data exposure involving Lemonade Insurance Agency’s insurance quotation platform? A proposed class action settlement may affect your rights.

A federal court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Lemonade, Inc. and Lemonade Insurance Agency, LLC, the “Defendants” or “Lemonade,” in a class action lawsuit about the alleged data exposure involving Lemonade’s online insurance quote platform, which occurred between April 2023 and September 18, 2024 (i.e., the Data Exposure).
- You are included in this Settlement as a “Settlement Class Member” if you received a notice of the Data Exposure informing you that your Personal Information (e.g., driver’s license numbers) was compromised. Those notices were sent in April 2025 and June 2025.
- As a Settlement Class Member, your rights are affected whether you act or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	<p>The only way to receive cash benefits from this Settlement is by submitting a timely and valid Claim Form.</p> <p>You can submit your Claim Form online at www.[website].com or download the Claim Form and mail it to the Settlement Administrator. You may also contact the Settlement Administrator to request a mailed paper copy of the Claim Form.</p> <p>All Class Members will automatically receive the Credit Monitoring and Insurance Services (“CMIS”) benefit, you do not need to submit a claim to receive this benefit.</p>	Month, __, 202X
OPT OUT OF THE SETTLEMENT	<p>You can choose to opt out of the Settlement. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can choose to retain your own legal counsel at your own expense. If you opt out, you will not be able to receive any benefits and you will not be bound by the terms of the Settlement Agreement.</p>	Month, __, 202X
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	<p>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 Settlement Class Member Benefits.</p>	Month, __, 202X
DO NOTHING	<p>If you do nothing, you will not receive any cash benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You will remain a Settlement Class Member and will still be able to activate your CMIS code.</p>	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 *In re Lemonade, Inc. Data Disclosure Litigation*, Case No. 1:25-cv-04106-JHR-KHP and is pending in the United States District Court for the Southern District of New York. The people who filed this Action are called the “Plaintiffs” and the companies they sued, Lemonade, Inc. and Lemonade Insurance Agency, LLC, are called the “Defendants.”

2. What is this Action about?

This Action alleges that Personal Information (e.g., driver’s license numbers) was potentially disclosed and/or accessed between April 2023 and September 2024, when cybercriminals entered unauthorized information into Defendants’ online insurance quote system. Among other things, the Action asserts claims against the Defendants for negligence, violation of the Driver’s Privacy Protection Act, and violation of the New York General Business Law Section 349.

The Defendants deny they did anything wrong and dispute they have any liability, but have agreed to settle this lawsuit on a class wide basis.

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 Brian Murray and Leslie Linwood Rich.

4. Why is there a Settlement?

The Court did not decide 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, think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all living, natural persons residing in the United States whose Personal Information was compromised in the Data Exposure, including all persons who were sent notice of the Data Exposure. The Settlement Class consists of approximately 190,000 individuals.

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

Yes, excluded from the Settlement Class are: (1) the Judge(s) presiding over the Action and members of their immediate families and their staff; (2) Lemonade, its subsidiaries, parent companies, successors, predecessors, and any entity in which Lemonade or its parents, have a controlling interest, and its current or former officers and directors; (3) natural persons who properly execute and submit a Request for

Exclusion prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such excluded natural person.

THE SETTLEMENT CLASS MEMBER BENEFITS

7. What can I get from this Settlement?

If approved by the Court, the Defendants will pay \$10,500,000 into a Settlement Fund to resolve the Settlement. In addition to the cash benefits below, all Settlement Class Members have been provided with a unique code to activate 3 years of Credit Monitoring and Insurance Services (“CMIS”). This is an automatic benefit to all Class Members except those who request exclusion from the Settlement. Once the Settlement receives final approval, Settlement Class Members will be able to enroll in the CMIS product provided under this Settlement using their CMIS code (see Question 10). Enrollment and activation of CMIS services will be available only after the Court grants final settlement approval. Instructions on how to activate the code will be provided on the website after the Settlement has been approved by the Court.

Settlement Class Members may choose to receive one or both of the following benefits payments:

- (1) **Documented Loss Payment:** Reimbursement of up to \$10,000 for documented losses on or after April 1, 2023 more likely than not traceable to the Data Exposure; and
- (2) **Cash Fund Payment:** A *pro rata* (proportional) cash payment.

8. Tell me more about the Documented Loss Payment.

Settlement Class Members may submit a claim for a Settlement Payment of up to \$10,000 for reimbursement in the form of a Documented Loss Payment. To receive a Documented Loss Payment, a Settlement Class Member must submit a valid Claim Form choosing to receive the Documented Loss Payment benefit, including an attestation regarding any actual and unreimbursed Documented Loss made under penalty of perjury; and providing Reasonable Documentation that demonstrates the Documented Loss to be reimbursed are more likely than not traceable to the Data Exposure. Compensable Documented Losses must have occurred after April 1, 2023. “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.

9. Tell me more about the Cash Fund Payment.

In addition to a Claim for a Documented Loss payment, Settlement Class Members also may submit a Claim to receive a *pro rata* (proportional) Settlement Payment in cash (i.e., a “Cash Fund Payment”).

After deducting Administrative Expenses, Fee Award and Costs, Service Awards, Escrow fees, and Taxes the balance of the Settlement Fund or Net Settlement Fund will be used to pay the cost of CMIS and Approved Claims for Documented Loss Payments. The amount of the Net Settlement Fund remaining after these deductions (the Post CM/DL Net Settlement Fund) will be used to make Cash Fund Payments to Settlement Class Members who submit a Valid Claim selecting this payment option. The description of the Cash Fund Payment calculation can be found in Section 3.10 of the Settlement Agreement.

10. Tell me more about Credit Monitoring and Insurance Services.

In addition to selecting one or both of the above Settlement Payment options, all Settlement Class Members will receive a unique code to activate 3 years of the CMIS product. The CMIS product will include at least the following services: (1) up to \$1 million dollars of identity theft insurance coverage; and (2) three bureau credit monitoring.

CMIS codes have been provided to all Settlement Class Members in the Notice (i.e., in the postcard notice). Settlement Class Members who do not know their CMIS code should use the “Contact Us” form of the Settlement Website or mail the Settlement Administrator at the address below to request that information:

In re Lemonade, Inc. Data Disclosure Litigation
c/o Kroll Settlement Administration LLC
P.O. Box XXXX
New York, NY 10150-XXXX

Once the Settlement receives final approval, Settlement Class Members will be able to activate the CMIS product using their unique CMIS code. Enrollment and activation of CMIS services will be available only after the Court grants final settlement approval.

Settlement Class Members are **not** required to submit a Claim Form to receive this Settlement Benefit. It is being distributed automatically as part of Notice.

11. 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 Defendants 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

12. How do I submit a Claim Form and get a Settlement Class Member Payment?

You must submit a Claim Form by **MM/DD/YYYY**. Claim Forms may be submitted online at [www.\[website\].com](http://www.[website].com) by 11:59 p.m. ET, or mailed postmarked by **MM/DD/YYYY** to the Settlement Administrator at:

In re Lemonade, Inc. Data Disclosure Litigation
c/o Kroll Settlement Administration LLC
P.O. Box XXXX
New York, NY 10150-XXXX

13. 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, 202X, at X:X0 .m. ET**, to decide whether to approve the Settlement, how much Settlement Attorneys’ fees, Expenses, and Costs to award Class Counsel for representing the Settlement Class, and Service Award payments to the Class Representatives who brought this Action on behalf of the Settlement Class.

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

14. Do I have a lawyer in this case?

Yes, the Court appointed Melissa R. Clark and Andrew W. Ferich of Ahdoot & Wolfson, PC, Mark B. DeSanto and E. Michelle Drake of Berger Montague PC, and John A. Yanchunis and Ronald Podolny

of Morgan & Morgan Complex Litigation Group, to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

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

15. Should I get my own lawyer?

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

16. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees up to one-third (33 1/3 %) of the Settlement Fund (i.e., \$3,500,000), reimbursement of litigation expenses and costs incurred as a necessity of prosecuting this matter, as well as \$2,000 Service Award payments to each of the Class Representatives. If approved, these amounts will be paid from the Settlement Fund before making payments to Settlement Class Members who submit Valid Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

17. 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 the Defendants 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 XX, 202X**.

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 "*In re Lemonade, Inc. Data Disclosure Litigation*";
- your name, address, telephone number, and Class Member ID;
- a statement indicating that you want to be excluded from the Settlement Class, such as "I hereby request to be excluded from the proposed Settlement Class in '*In re Lemonade, Inc. Data Disclosure Litigation*.'";
- identify the lawyer representing you (if any); and
- your personal signature or the signature of your legal guardian or representative.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **Month XX, 202X**.

In re Lemonade, Inc. Data Disclosure Litigation
c/o Kroll Settlement Administration LLC
ATTN: Exclusion Request
P.O. Box **XXXX**
New York, NY 10150-**XXXX**

A request to be excluded that is sent to an address other than that designated as the Settlement Administrator's address shall be invalid and the person serving such a request shall be considered a member of the Settlement Class and shall be bound by the terms of the Settlement.

OBJECTING TO THE SETTLEMENT

18. 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, costs and expenses, or Service Award payments, the Releases provided to the Defendant, or some other aspect of the Settlement. You cannot ask the Court to order a different settlement; the Court can only approve or reject this Settlement. If the Court denies approval, no Settlement payments will be sent out, and the lawsuit will continue. 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 be in writing and include:

- a. the case name and number (i.e., *In re Lemonade, Inc. Data Disclosure Litigation*, Case No. 1:25-cv-04106-JHR-KHP);
- b. your full name, current mailing address, and telephone number;
- c. a statement indicating that you believe you are a member of the Settlement Class;
- d. proof that you are a member of the Settlement Class (e.g., copy of the settlement notice, copy of the original notice of the Data Exposure);
- e. the specific factual and legal grounds for the objection;
- f. whether the Objection is an objection to the Settlement in part or in whole;
- g. whether the objection applies only to you, a subset of the Settlement Class, or the entire Settlement Class;
- h. all counsel representing you, if any;
- i. a list, including case name, court, and docket number, of all other cases in which you and/or your counsel have filed an objection to any proposed class action settlement in the past 5 years;
- j. all documents or writings that you want the Court to consider;
- k. a statement regarding whether you (or counsel of your choosing) intends to appear at the Final Approval Hearing; and
- l. your personal signature or the signature of your duly authorized attorney or representative.

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

Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

A copy of your objection also must be mailed to Class Counsel, Defendants’ Counsel and the Settlement Administrator at the addresses below, postmarked no later than **Month XX, 202X**.

CLASS COUNSEL		
Melissa R. Clark Ahdoot & Wolfson, PC 521 5th Avenue, 17th Floor New York, NY 10175 Andrew W. Ferich Ahdoot & Wolfson, PC 201 King of Prussia Road Suite 650 Radnor, PA 19087	Mark B. DeSanto Berger Montague PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103 E. Michelle Drake Berger Montague PC 1229 Tyler Street NE, Suite 205 Minneapolis, MN 55413	John A. Yanchunis Ronald Podolny Morgan & Morgan Complex Litigation Group 201 N. Franklin Street 7th Floor Tampa, FL 33602
DEFENDANTS’ COUNSEL	SETTLEMENT ADMINISTRATOR	
Tiana A. Demas	<i>In re Lemonade, Inc. Data Disclosure Litigation</i>	

Anne Bigler Cooley LLP 55 Hudson Yards New York, NY 10001	c/o Kroll Settlement Administration LLC ATTN: Objections PO Box XXXX New York, NY 10150-XXXX
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19. 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

20. When is the Court’s Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **Month XX, 202X at XX:X0 .m. ET**, at Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, to decide whether to approve the Settlement, how much Settlement Attorneys’ fees, Costs, 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.

21. 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

22. 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 Defendants and 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 Releases of the Released Parties in the Settlement and will not be eligible to receive a Settlement Payment, but you will still be able to activate your unique Credit Monitoring and Insurance Services code to receive the CMIS benefit.

GETTING MORE INFORMATION

23. 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.\[website\].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:

In re Lemonade, Inc. Data Disclosure Litigation
 c/o Kroll Settlement Administration LLC

P.O. Box XXXX
New York, NY 10150-XXXX

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANTS.
THEY CANNOT ANSWER ANY QUESTIONS.**