

Exhibit C

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the District of Nebraska
In Re: Regional Care Data Security Incident Litigation, Case No. 4:24CV3236

Were you notified that your Private Information may have been impacted by a Data Breach at Regional Care, Inc. on September 18, 2024? 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 Settlement has been reached with Regional Care, Inc. (the “Defendant” or “RCI”) in a class action lawsuit about a data breach on September 18, 2024 (the “Incident”). During the Incident, unauthorized actors gained access to RCI’s computer systems and accessed, compromised, and/or took files that contained Private Information. The Plaintiffs allege claims of negligence, breach of contract, breach of implied contract, and failure to provide adequate notice, among others. The Defendant denies all allegations and any wrongdoing.
- The Settlement Class includes all persons RCI identified as being among those individuals impacted by the Incident, including all who were sent a notice of the Incident.
- If approved by the Court, the Defendant will pay \$2,600,000 into a Settlement Fund to resolve the Litigation. The Settlement Fund will provide benefits to Settlement Class Members, including reimbursement of up to \$5,000 of documented losses per individual, *pro rata* cash payments, and credit monitoring services, as well as Administrative Costs, Service Awards, and Attorneys’ Fees and Expenses.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive benefits from this Settlement is to submit a valid and timely Claim Form.	Month XX, 202X
OPT OUT OF/EXCLUDE YOURSELF FROM THE SETTLEMENT	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant about the claims resolved by this Settlement. You will not receive any benefits from the Settlement.	Month XX, 202X
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing . If you object, you can still submit a Claim Form for benefits.	Month XX, 202X
DO NOTHING	If you do nothing, you will not get any benefits and you give up the right to sue the Defendant about the claims resolved by this Settlement.	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.

Questions? Call (XXX) XXX-XXXX or visit [www.\[website\].com](http://www.[website].com).

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BASIC INFORMATION

1. Why was this Notice issued?

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

The Litigation is called *In Re: Regional Care Data Security Incident Litigation*, Case No. 4:24CV3236 pending in the United States District Court for the District of Nebraska. The people who filed this Litigation are called the “Plaintiffs” and the company they sued, Regional Care, Inc. (“RCI”), is called the “Defendant.”

2. What is this Litigation about?

On September 18, 2024, unauthorized actors gained access to RCI’s computer systems and accessed, compromised, and/or took files that contained Private Information (the “Incident”). This Private Information consisted of full names, Social Security Numbers, dates of birth, gender, health insurance information, and medical information. On or around December 16, 2024, the Defendant began notifying potentially impacted individuals about the Incident. The Plaintiffs allege claims of negligence, breach of contract, breach of implied contract, and failure to provide adequate notice, among others. The Defendant denies all of the Plaintiffs’ claims and maintain that they did not do anything wrong.

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 “Representative Plaintiffs” 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 Representative Plaintiffs are Aisha Chisolm, Keri Foster, Daniel Reznor, Jerry Gibbons, Bacmy Dinh Nguyen, and Leslie Cook.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that they have not violated any laws. The Plaintiffs and the Defendant 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 as “Settlement Class Counsel,” 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 RCI identified as being among those individuals impacted by the Incident, including all who were sent a notice of the Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: any judge presiding over this matter and any members of their first-degree relatives, judicial staff, RCI’s officers, directors, and members, and persons who timely and validly request exclusion from the Settlement Class.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If approved by the Court, the Defendant will pay \$2,600,000 into a Settlement Fund to resolve the Litigation. The Settlement Fund will provide Settlement benefits to Settlement Class Members as well as Administrative Costs, Service Awards, and Attorneys' Fees and Expenses.

Settlement Class Members may submit a claim to receive any or all of the following Settlement benefits:

- **Documented Losses Payment:** Reimbursement of documented losses of up to \$5,000 per individual for documented losses fairly traceable to the Incident. Documentation is required.
- **Pro Rata Cash Payment:** A *pro rata* cash payment, estimated to be \$XX. No documentation is required. The payment amount will be determined based on the amount of valid claims submitted.
- **Credit Monitoring Services:** Two (2) years of One Bureau Credit Monitoring Services.

8. Tell me more about the Documented Losses Payment.

Settlement Class Members may submit a claim for reimbursement of up to \$5,000 per individual for documented losses fairly traceable to the Incident. Documented losses may include, but are not limited to: (i) unreimbursed losses relating to fraud or identity theft; (ii) credit monitoring costs that were incurred on or after the Incident through the date of claim submission; and (iii) bank fees, long distance phone charges, postage, or gasoline for local travel. You may claim any documented losses reasonably related to the Incident or to mitigating the effects of the Incident. The Claims Administrator will determine whether any claimed loss is reasonably related to the Incident.

You must submit documentation supporting your claim for a Documented Losses Payment. This can include receipts or other documentation that is not "self-prepared" that documents the costs incurred. "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.

9. Tell me more about the Pro Rata Cash Payment?

In addition to the Documented Losses Payment, Settlement Class Members can submit a Claim Form for a Pro Rata Cash Payment, estimated to be \$XX. No documentation is required to make this claim. The amount of the Pro Rata Cash Payments will be increased or decreased on a *pro rata* (proportional) basis, depending upon the number of valid claims filed and the amount of funds available for these payments.

10. Tell me more about the Credit Monitoring Services.

In addition to the Documented Losses Payment and Pro Rata Cash Payment, all Settlement Class Members may also submit a claim for two (2) years of One Bureau Credit Monitoring Services. If you submit a timely and valid claim, you will receive an activation code for the Credit Monitoring Services after the Court grants final approval of the Settlement.

11. What claims am I releasing if I stay in the Settlement?

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

HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM

12. How do I submit a Claim Form to get Settlement benefits?

You must submit a Claim Form by **Month XX, 202X** to receive benefits. Claim Forms must be submitted, with any necessary supporting documentation, online at [www.\[website\].com](http://www.[website].com) or by mail, postmarked by **Month XX, 202X**, to the Claims Administrator at:

Questions? Call **(XXX) XXX-XXXX** or visit [www.\[website\].com](http://www.[website].com).

Claims Administrator – XXXXX
c/o Kroll Settlement Administration LLC
P.O. Box XXXXXX
New York, NY 10150-XXXX

13. When will I get Settlement 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**, to decide whether to approve the Settlement, Settlement Class Counsel’s request for Attorneys’ Fees and Expenses, and the Service Award to the Representative Plaintiffs who brought this Litigation 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 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 Milberg, PLLC and Chestnut Cambronne PA to represent you and other members of the Settlement Class as Settlement Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund subject to Court approval.

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?

Settlement Class Counsel will ask the Court to approve attorneys’ fees of up to one-third of the Settlement Fund (\$866,666) plus reimbursement of reasonable costs and expenses, as well as a \$2,500 Service Award for each of the Representative Plaintiffs. If approved, these amounts will be paid from the Settlement Fund before distributing Settlement benefits 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 Defendant 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.

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

- Your full name, address, and telephone number;
- A statement indicating your intent to request exclusion “I wish to opt out of the Settlement in *In Re: Regional Care Data Security Incident Litigation*, Case No. 4:24CV3236.”;
- Your individual signature.

Your Request for Exclusion must be mailed to the Claims Administrator at the address below, postmarked no later than **Month XX, 202X**.

Claims Administrator – XXXXX
c/o Kroll Settlement Administration LLC
ATTN: Requests for Exclusion
P.O. Box XXXXXX
New York, NY 10150-XXXX

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 benefits, request Attorneys' Fees and Expenses Award, or Service Award, Releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement. The Court can only approve or deny the Class Settlement Agreement and cannot change the terms.

To be considered by the Court, your objection must include:

- The case name and number, *In Re: Regional Care Data Security Incident Litigation*, Case No. 4:24CV3236;
- Your full name, mailing address, telephone number, and email address (if any);
- All grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
- The number of times you have objected to a class action settlement within the five (5) years preceding the date that you file the objection, the caption of each case in which you made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- The identity of all counsel (if any) who represent you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards, and whether they will appear at the Final Approval Hearing;
- The number of times your counsel and/or counsel's law firm have objected to a class action settlement, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your counsel and/or counsel's law firm have objected to a class action settlement;
- Whether you, your counsel and/or counsel's law firm has received any third-party funding, including funding through charitable donations, in connection with filing their objection and the identity of any such party, including the identity of any third parties with whom you, your counsel and/or counsel's law firm have contingency agreements to receive compensation in relation to the objection;
- The identity of any third parties with whom you, your counsel and/or counsel's law firm consulted in the process of preparing their objection including, but not limited to, any experts or outside counsel;
- Whether you or your counsel utilized AI in drafting any portion of the objection;
- A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
- A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and
- Your signature (an attorney's signature is not sufficient).

Questions? Call (XXX) XXX-XXXX or visit [www.\[website\].com](http://www.[website].com).

Objections must be mailed to the Claims Administrator, postmarked by **Month XX, 202X**, at the following address:

Claims Administrator – XXXXX
c/o Kroll Settlement Administration LLC
ATTN: Objections
P.O. Box XXXXXX
New York, NY 10150-XXXX

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 a.m./p.m. XT**, at **[Courthouse Name and Address]** to decide whether to approve the Settlement, Settlement Class Counsel's request for Attorneys' Fees, Expenses Award of up to \$866,666, plus reimbursement of reasonable costs and expenses, and a \$2,500 Service Award to each of the Representative Plaintiffs. The date and time of this hearing may change without further notice. Please check **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 Defendant 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 in the Settlement and will not be eligible to receive any Settlement benefits.

GETTING MORE INFORMATION

23. How do I get more information?

This Notices summarizes the proposed Settlement. Complete details are provided in the Class Settlement Agreement. The Class Settlement Agreement and other related documents are available at the settlement website, **www.[website].com**.

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

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

Questions? Call (XXX) XXX-XXXX or visit **www.[website].com.**