

# 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

**ELECTRONIC SERVICE REQUESTED**

**LEGAL NOTICE**

*In Re: Knight Barry Title, Inc. Data Incident Litigation*  
Case No. 2:24-cv-00211-LA

**If You Are an Individual to Whom Defendant Sent  
Notice of the Data Incident on or Around February  
1, 2024, You Are Eligible to Receive a Settlement  
Benefit from a Class Action Settlement**

This is not a solicitation from a lawyer.

**This is NOT a Claim Form.**

For more information about the settlement  
and how to file a Claim Form visit or call:

[www.website.com](http://www.website.com)

<<Reftnum Barcode>>

CLASS MEMBER ID: <<Reftnum>>

Postal Service: Please do not mark barcode

<<FirstName>> <<LastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>-<<zip4>>  
<<Country>>

A proposed settlement has been reached in a class action called *In Re: Knight Barry Title, Inc. Data Incident Litigation*, Case No. 2:24-cv-00211-LA, pending in the United States District Court for the Eastern District of Wisconsin, which arises from the alleged compromise of personal identifying information (PII or Private Information) of Plaintiffs and Class Members as a result of a ransomware cyberattack Defendant experienced on or about August 15, 2023, or the Data Incident. Plaintiffs and Class Members include current and former clients of Defendant whose Private Information was allegedly compromised in the Data Incident. In response to the Data Incident, Defendant, or KBT, sent a Notice Letter informing affected individuals that their PII may have been compromised. Defendant denies any wrongdoing.

**What Is This Notice About?** If you received a Notice Letter from Defendant on or around February 1, 2024, you have a right to know about the proposed settlement of a class action lawsuit and your options. If you have received this Notice, you have been identified from available records as having been notified by the Defendant during the time at issue in the Litigation.

**Who Is Included?** You are part of the Settlement Class if you are an individual to whom Defendant sent notice of the Data Incident on or around February 1, 2024.

**What Does the Settlement Provide?** With Court approval, the settlement provides the following settlement benefits available to Class Members who submit Valid Claims: (a) Reimbursement of Out-of-Pocket Losses up to \$5,000 per individual, subject to an Out-of-Pocket Loss Cap; (b) Pro Rata Cash Payment; and (c) Identity Theft Protection and Credit Monitoring for three (3) years of free identity-theft protection and credit monitoring.

**How to Get Benefits:** You must complete and file a Claim Form online or by mail **postmarked by <Claims Deadline>**. You can file your Claim online at [www.website.com](http://www.website.com). You may also get a paper Claim Form at the above Settlement Website, or by calling the toll-free telephone number below, and submit by U.S. mail to <Mailing Caption>, c/o Kroll Settlement Administration LLC, P.O. Box XXXX, New York, NY 10150-XXXX. **TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR VALID CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT [WWW.WEBSITE.COM](http://WWW.WEBSITE.COM).**

**Your Other Options.** If you do not want to be legally bound by the settlement, you must exclude yourself by **[Opt-Out Date]** by mailing a request to opt-out to the Settlement Administrator at <Mailing Caption>, c/o Kroll Settlement Administration LLC, P.O. Box XXXX, New York, NY 10150-XXXX and **postmarked on or before [Opt-Out Date]**. If you do not exclude yourself, you will release any claims you may have against Defendant or Related Entities (as defined in the Settlement Agreement) related to the Litigation, as more fully described in the Settlement Agreement, available at the Settlement Website. If you do not exclude yourself and do not like the settlement, you can tell the Court why you think the settlement should not be approved. You may object to the settlement by **[Objection Date]**. Please review the Long Notice on the Settlement Website for further details.

**The Final Fairness Hearing.** On **[DATE]**, at **[TIME] CT**, the Court will hold a hearing in the United States District Court for the Eastern District of Wisconsin, to consider whether the settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on Attorneys' Fees, Costs, and Expenses and/or Service Awards payments. You or your attorney may attend and ask to appear at the hearing, but you are not required to do so.

**More Information.** This is only a summary of the proposed settlement. If you have questions, need to update your address or want to view the detailed Long Notice or other documents about the Litigation or the proposed settlement, including the Settlement Agreement, you may visit [www.website.com](http://www.website.com) or call the Settlement Administrator at **(XXX) XXX-XXXX**.