

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Michelle Jackson, <i>on behalf of herself</i>)	
<i>and others similarly situated,</i>)	No.: 2:25-cv-00535-MTL
)	
Plaintiff,)	
)	
v.)	
)	
Gen Digital Inc.,)	
)	
Defendant.)	
_____)	

WEBSITE Q & A NOTICE

This is a notice of a settlement of a class action lawsuit.

This is not a notice of a lawsuit against you.

If you received an artificial or prerecorded voice call on your cellular telephone from Gen Digital Inc. (“Gen”) between February 19, 2021 and October 30, 2025 regarding a LifeLock or Norton account and you did not have a LifeLock or Norton account, you may be entitled to compensation as a result of the settlement in the class action lawsuit captioned:

Michelle Jackson v. Gen Digital Inc., No. 2:25-cv-00535-MTL (D. Ariz.)

A federal court authorized this notice.

This is not a solicitation from a lawyer.

Please read this notice carefully.

It explains your rights and options to participate in a class action settlement.

What are your legal rights and options?

SUBMIT A TIMELY CLAIM FORM:	If you are a class member and you submit a timely, valid claim form you will receive a proportionate share of the \$9.95 million settlement fund after various expenses are deducted, and you will release claims you may have against Gen related to this case. It is estimated that each claimant will receive between \$200 and \$625, depending on the number of participating class members.
DO NOTHING:	If you are a class member and you do nothing, you will <u>not</u> receive a share of the settlement fund, but you will release claims you may have against Gen related to this case.
EXCLUDE YOURSELF:	If you are a class member and you exclude yourself from the settlement, you will <u>not</u> receive a share of the settlement fund, and you will <u>not</u> release any claims you have against Gen.
OBJECT:	If you are a class member, you may object to the settlement.

Why is this notice available?

This is a notice of a proposed settlement in a class action lawsuit. The settlement would resolve the lawsuit Michelle Jackson filed against Gen. Please read this notice carefully. It explains the lawsuit, the settlement, and your legal rights, including the process for receiving a settlement payment, excluding yourself from the settlement, or objecting to the settlement.

What is this lawsuit about?

Ms. Jackson filed a proposed class action lawsuit against Gen, alleging that it violated the Telephone Consumer Protection Act (“TCPA”) by using an artificial or prerecorded voice in connection with calls it placed regarding LifeLock and Norton accounts to cellular telephone numbers of persons who are not its customers or account holders. The TCPA provides for \$500, and up to \$1,500, in damages for violations. However, among other defenses, prior express consent is a complete defense to a TCPA claim. In addition, calls made for emergency purposes are not actionable under the TCPA.

Gen denies the allegations and denies that it violated the TCPA. The Court did not decide who is right or wrong. The parties have agreed to a settlement.

Why is this a class action?

In a class action, one or more people called “class representatives” file a lawsuit on behalf of people who have similar claims. All of these people together are a “class” or “class members.” The Court accordingly resolves claims for all class members, except for those who exclude themselves from the class.

Why is there a settlement?

Ms. Jackson, on the one hand, and Gen, on the other, have agreed to settle the lawsuit to avoid the time, risk, and expense associated with continued litigation, and to achieve a final resolution of disputed claims. Under the settlement, class members will obtain a payment to resolve the claims that Ms. Jackson raised in the lawsuit. Ms. Jackson and her attorneys think the settlement is in the best interest of all class members.

How do you know if your claims are included in the settlement?

This settlement resolves claims on behalf of the following class:

All persons throughout the United States (1) to whom Gen Digital Inc. placed, or caused to be placed, a call regarding a LifeLock or Norton account, (2) directed to a telephone number assigned to a cellular telephone service, but not assigned to a person who has or had an account with LifeLock or Norton account with Gen Digital Inc., (3) in connection with which Gen Digital Inc. used or caused to be used an artificial or prerecorded voice, (4) from February 19, 2021 to October 30, 2025.

What does the settlement provide?

Gen will establish a settlement fund in the amount of \$9.95 million. Out of the settlement fund, Gen will pay:

- a. Settlement compensation to the class members;
- b. The costs and expenses of administering the class action settlement;
- c. An award of attorneys’ fees, subject to the Court’s approval;
- d. Costs and expenses incurred litigating this matter, subject to the Court’s approval; and

e. A service award to Ms. Jackson, subject to the Court's approval.

Each class member who submits a timely and valid claim form will be entitled, subject to the provisions of the settlement agreement, to his or her equal share of the settlement fund as it exists after deducting:

a. Costs and expenses of administering the class action settlement, estimated to be \$315,400;

b. Attorneys' fees in an amount not to exceed one-third of the settlement fund, subject to the Court's approval;

c. Costs and litigation expenses not to exceed \$20,000, subject to the Court's approval; and

d. A service award for Ms. Jackson, not to exceed \$15,000, subject to the Court's approval.

How can you get a payment?

You must mail a valid claim form to the *Jackson v. Gen* Settlement Administrator, c/o Kroll Settlement Administration, [address], postmarked by [date], 2026. Or you must submit a valid claim through www.JacksonIVRsettlement.com by the same date.

If you did not receive a claim form in the mail but you believe you are a settlement class member, you must provide to the claims administrator evidence of having received from Gen one or more calls with an artificial or prerecorded voice regarding a LifeLock or Norton account during the settlement class period, and attest to the fact that you were not a customer of LifeLock or Norton when you received these calls. Upon the provision of such evidence, the claims administrator will then send a claim form for you to complete. More information can be found in the settlement agreement, which is available on the settlement website, www.JacksonIVRsettlement.com.

When will you be paid?

If the Court grants final approval of the settlement, settlement payments will be sent to class members who submitted valid claim forms no later than 30 days after the judgment in the lawsuit becomes final, unless additional time is necessary to comply with IRS regulations. If there is an appeal of the settlement, payment may be delayed by the appeal.

What rights are you giving up in this settlement?

Unless you exclude yourself from the settlement, and if you meet the class definition, you will be considered a member of the class, which means you give up your

right to sue or continue a lawsuit against Gen over the released claims. Giving up your legal claims is called a release. Unless you formally exclude yourself from the settlement, you will release your claims against Gen.

For more information on the release, released parties, and released claims, you may obtain a copy of the class action settlement agreement on the settlement website, www.JacksonIVRsettlement.com, or through Public Access to Court Electronic Records (PACER).

How can you exclude yourself from the settlement?

You may exclude yourself from the settlement, in which case you will not receive a payment. If you wish to exclude yourself from the settlement, you must mail a written request for exclusion to the claims administrator, at the addresses set forth below, postmarked by **[date]**, **2026**. You must include in your request for exclusion:

- a. Your full name;
- b. Your address;
- c. Your cellular telephone number, which was called by Gen using an artificial or prerecorded voice;
- d. A statement attesting to the fact that when you received a call from Gen, you were not a LifeLock or Norton customer; and
- e. A clear and unambiguous statement that you wish to be excluded from the settlement, such as “I request to be excluded from the settlement in the *Jackson v. Gen* action.”

You must sign the request personally. If any person signs on your behalf, that person must attach a copy of the power of attorney authorizing that signature.

When and where will the Court decide whether to approve the settlement?

The Court will hold a final fairness hearing on **[date]**, at **[time]**. The hearing will take place **virtually**. At the final fairness hearing, the Court will consider whether the settlement is fair, reasonable, and adequate and, if so, whether final approval of the settlement should be granted. The Court will hear objections to the settlement, if any. The Court may make a decision at that time, postpone a decision, or continue the hearing.

Do you have to attend the hearing?

No. You are not required to attend the hearing. But you are welcome to attend the hearing at your own expense. However, you cannot speak at the hearing if you have

excluded yourself from the class settlement. Once you have excluded yourself, the class settlement does not affect your legal rights.

What if you want to object to the settlement?

If you do not exclude yourself from the settlement, if you are a class member you can object to the settlement if you do not believe it is fair, reasonable, and adequate. If you wish to object, you must mail a written notice of objection, postmarked by **[date], 2026**, to Class Counsel, Gen's attorneys, and to the Court, at the following addresses:

Class Counsel:

Michael L. Greenwald
Greenwald Davidson
Radbil PLLC
5550 Glades Rd., Suite
500
Boca Raton, FL 33431

Defendant's Counsel:

Artin Betpera
Buchalter, a Professional
Corporation
18400 Von Karman Avenue
Suite 800
Irvine, CA 92612

Court:

U.S. District Court for the
District of Arizona
Sandra Day O'Connor U.S.
Courthouse
401 W. Washington Street
Phoenix, AZ 85003

You must include in your objection:

- a. Your full name;
- b. Your address;
- c. Any documents establishing, or provide information sufficient to allow the Parties to confirm, that you are a Settlement Class Member, including providing the cellular telephone number to which Gen placed a call or calls with an artificial or prerecorded voice regarding a LifeLock or Norton account during the Settlement Class Period;
- d. A statement of the specific objection(s);
- e. A description of the facts underlying the objection, including any documents that you would like the Court to consider;
- f. A description of the legal authorities that support each objection; and
- g. A statement noting whether you intend to appear at the final fairness hearing and wish to be heard.

By when must you enter an appearance?

Any class member who objects to the settlement and wishes to enter an appearance must do so by **[date], 2026**. To enter an appearance, you must file with the Clerk of the

Court a written notice of your appearance and you must serve a copy of that notice, by U.S. mail or hand-delivery, upon Class Counsel and Gen's attorneys, at the addresses set forth above.

What if you do nothing?

If you are in the class, do nothing, and the Court approves the settlement agreement, you will not receive a share of the settlement fund, but you will release any claim you have against Gen related to the allegations in this case. Unless you exclude yourself from the settlement, you will not be able to sue or continue a separate lawsuit against Gen over the released claims.

What will happen if the Court does not approve the settlement?

If the Court does not finally approve the settlement or if it finally approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will receive no benefits at this time, and the lawsuit will continue.

Who are Ms. Jackson's attorneys?

Ms. Jackson's attorneys are:

Michael L. Greenwald
Greenwald Davidson Radbil PLLC
5550 Glades Road, Suite 500
Boca Raton, FL 33431

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043

The Court has appointed Ms. Jackson's attorneys to act as Class Counsel. You do not have to pay Class Counsel. If you want to be represented by your own lawyer, and have that lawyer appear in Court for you in this case, you must hire one at your own expense.

Who are Gen's attorneys?

Gen's attorneys are:

Artin Betpera
Buchalter, a Professional Corporation
18400 Von Karman Avenue
Suite 800

Irvine, CA 92612

Before what Court is this matter pending?

Ms. Jackson filed her class action lawsuit in the following Court:

United States District Court for the District of Arizona
Sandra D. O'Connor U.S. Courthouse
401 W. Washington Street
Phoenix, AZ 85003

Where can you get additional information?

This notice is only a summary of the settlement. All documents filed with the Court, including the full class action settlement agreement, may be reviewed or copied at the United States District Court for the District of Arizona. In addition, pertinent case materials, including the settlement agreement and other documents, are available at the settlement website, **www.LifeLockTCPAsettlement.com**.

If you would like additional information about this matter, please contact:

Jackson v. Gen Settlement Administrator
c/o Kroll Settlement Administration
[Address]

Please do not call the Judge or the Clerk of Court about this case. Neither the Judge, nor the Clerk of Court, will be able to give you advice about this case. Furthermore, neither Gen nor Gen's attorneys represent you, and they cannot give you legal advice.