

EXHIBIT F

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In the United States District Court for the Western District of Virginia
Johnson et al. v. Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC, Case No. 7:24-cv-00144

IF YOUR PERSONAL INFORMATION WAS POTENTIALLY IMPACTED BY A CYBERSECURITY INCIDENT THAT PHYSICIANS TO WOMEN, INC. AND MID-ATLANTIC WOMEN'S CARE, PLC EXPERIENCED IN APRIL 2023, 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 Physicians to Women, Inc. ("PTW") and Mid-Atlantic Women's Care, PLC ("MAWC") (collectively, "Defendants") in a class action lawsuit about a cybersecurity incident that occurred in or around April 2023 ("Security Incident").
- The lawsuit is captioned *Johnson et al. v. Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC*, 7:24-cv-00144 (In the United States District Court for the Western District of Virginia). Defendants deny the allegations and all liability or wrongdoing with respect to any and all facts and claims alleged in the lawsuit but has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is an individual who resides in the United States and whom Defendants identified as having data at issue in the Security Incident.
- Whose personal information was impacted by the cybersecurity incident that affected PTW and MAWC in or around April 2023.
- As Settlement Class Member, your rights are affected whether you act or don't act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	<p>The only way to receive cash and other benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>You can submit your Claim Form online at _____ or mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p>	_____, 2025
OPT OUT OF THE SETTLEMENT	<p>You can choose to opt out of the Settlement and receive no payment. 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 elect to retain your own legal counsel at your own expense. If you opt out you will not be able to participate in the cash and other benefits from the Settlement.</p>	_____, 2025
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 don't 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 benefits.</p>	_____, 2025
DO NOTHING	<p>Unless you opt out of the settlement, you are part of the Settlement. If you do nothing, you will not get a payment 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.</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 has to decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION.....3

WHO IS IN THE SETTLEMENT.....4

THE SETTLEMENT BENEFITS4

HOW TO GET A PAYMENT—MAKING A CLAIM6

THE LAWYERS REPRESENTING YOU6

OPTING OUT OF THE SETTLEMENT7

COMMENTING ON OR OBJECTING TO THE SETTLEMENT8

THE COURT’S FINAL APPROVAL HEARING9

IF I DO NOTHING.....9

GETTING MORE INFORMATION.....9

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 lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is captioned *Johnson et al. v. Physicians to Women, Inc. and Mid-Atlantic Women’s Care, PLC*, 7:24-cv-00144 (In the United States District Court for the Western District of Virginia). The people that filed this lawsuit are called the “Plaintiffs” and the companies they sued, Physicians to Women, Inc. and Mid-Atlantic Women’s Care, PLC, are called the “Defendants.”

2. What is this lawsuit about?

This lawsuit alleges that personal information was impacted by the cybersecurity incident that affected Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC in or around April 2023 ("Security Incident"). The following types of information were present in the affected files that were accessed and acquired by the unauthorized actor: names, Social Security numbers, dates of birth, and medical/health information.

Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC deny all of the Plaintiffs' claims and maintains 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 "Class Representatives" or "Plaintiffs." Together, the people included in the class action are called a "class" or "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 Latoya Johnson, Janet Hall and Virginia Trupia-Lash.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendants. The Defendants deny all claims and contend that they have not violated any laws. Plaintiffs and the 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 payments and other benefits. The Plaintiffs and their attorneys, who also represent the 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 individuals who reside in the United States and whom Defendants identified as having data at issue in the Security Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) Physicians to Women, Inc., its officers and directors; (ii) Mid-Atlantic Women's Care, PLC, its officers and directors; (iii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iv) any judges assigned to this case and their staff and family; and (v) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Security 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 calling, emailing or writing to the Settlement Administrator at:

Toll-Free: 1-XXX-XXX-XXXX

[email address]

Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC, c/o Settlement Administrator, [address].

You may also view the Settlement Agreement and Release ("Settlement Agreement") at [Website URL].

Please do not contact the Court with questions.

THE SETTLEMENT BENEFITS

7. What can I Get?

If approved by the Court, Defendant MAWC will establish a Settlement Fund of \$918,510.00 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses, attorneys' fees and costs, and any service awards.

If you received a notice from Defendants concerning the Security Incident, you may submit a claim.

The settlement will provide two years of one-credit bureau credit monitoring services, medical monitoring, and identity protection services to all Settlement Class Members who submit a valid and timely claim for such services. Even if Settlement Class Members previously accepted the Defendants' offer of complimentary credit monitoring services, they may still claim this benefit.

The settlement will also provide cash payments to people who submit valid and timely claims.

There are two type of payments that are available to Class Members:

- (1) Reimbursement of up to \$10,000 in Out-of-Pocket Losses per claimant, subject to a *pro rata* (proportional) adjustment depending upon the number of valid claims; and
- (2) A *pro rata* (proportional) share of the Net Settlement Fund.

8. 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 [\[Website URL\]](#).

HOW TO GET A PAYMENT - MAKING A CLAIM

9. How do I submit a claim and get a cash payment?

Claim Forms may be submitted online at [\[Website URL\]](#) or mailed to the Settlement Administrator at: *Physicians to Women, Inc. and Mid-Atlantic Women’s Care, PLC*, c/o Settlement Administrator, [\[address\]](#).

You may also contact the Settlement Administrator to request a Claim Form by telephone 1-[XXX-XXX-XXXX](#), by email [\[Email Address\]](#), or by U.S. mail at the address above.

10. What is the deadline for submitting a claim?

If you submit a claim by U.S. mail, the completed and signed Claim Form must be postmarked by [\[Deadline Date\]](#). If submitting a Claim Form online, you must do so by [\[Deadline Date\]](#).

11. When will I get my payment?

The short answer is – after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a final approval hearing on _____, 2025 to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award Service Awards 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 payments will be distributed as soon as possible, if and when the Court grants final approval to the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

Yes, the Court appointed Andrew Shamis of Shamis & Gentile, P.A., Raina Borrelli of Strauss Borrelli PLLC and David Lietz of Milberg Coleman Bryson Phillips Grossman, LLC, to represent you and other members of the Settlement Class (“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).

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

13. Should I get my own lawyer?

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

14. How will the lawyers be paid?

Settlement Class Counsel’s attorneys’ fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the Court of no more than \$306,139.38 in attorney’s fees and \$20,000 in reasonable expenses. Settlement Class Counsel is entitled to seek no more than one third of the Settlement Fund as reasonable attorneys’ fees, subject to Court approval. As approved by the Court, the Settlement Class Representatives will each be paid a Service Award from the Settlement Fund for bringing and settling the case. The Settlement Class Representatives will seek no more than \$5,000 each as a service award, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. 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 deadline for requesting exclusion from the Settlement is **[Deadline Date]**.

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

- the case name: *Johnson et al. v. Physicians to Women, Inc. and Mid-Atlantic Women’s Care, PLC*, Civil Action No. 7:24-cv-00144-MFU-CKM (In the United States District

Court for the Western District of Virginia).

- your full name;
- current address;
- personal signature; and
- the words “Request for Exclusion” or a comparable statement that you do not wish to participate in the Settlement.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **[Deadline Date]**.

Physicians to Women, Inc. and Mid-Atlantic Women’s Care, PLC, Security Incident
Settlement Administrator
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 may only exclude yourself – not any other person.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

16. How do I tell the Court if I like or 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, the request for attorneys’ fees or service awards, the releases provided to the Defendants, or some other aspect of the Settlement. 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 include: (i) the name of the proceedings; (ii) the Settlement Class Member’s full name and current mailing address; (iii) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection; (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 Class Member in the previous five (5) years; and (vii) the signature of the Settlement Class Member or the Settlement Class Member’s attorney.

Any Settlement Class Member who does not file a timely and adequate objection in accordance with the above paragraph waives the right to object to the Settlement at the Final Approval Hearing and shall be bound by the terms of the Settlement Agreement and by all orders and judgments in the Action.

Objections must be filed with the Court no later than **[Deadline Date]**.

Clerk of the Court
210 Franklin Road S.W., Suite 540
Roanoke, VA 24011

A copy of your objection also must be mailed to the Settlement Administrator at the address below, postmarked no later than **[Deadline Date]**.

Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC, Security Incident
Settlement Administrator
ATTN: Objections
[address]

17. 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 means telling the Court you do not want to be part of the Settlement. If you exclude yourself/opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

18. When is the Court's Final Approval Hearing?

The Court is scheduled to hold a final approval hearing on _____, 2025 at _____ a.m./p.m. E.T., at [address/via zoom], Courtroom _____, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a service award payment to each Class Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost. If you do not like the Settlement, remember you may object to it, but you have to follow certain requirements (see Question 16). The date and time of this hearing may change without further notice. Please check [www._____](http://www._____.com) for updates.

19. Do I have to come to the Final Approval Hearing?

No. Settlement 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 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 such attendance is not necessary for the Court to consider an objection that was filed on time and meets the requirements above.

IF I DO NOTHING

21. 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 not be eligible to receive a payment or other benefits from this Settlement.

GETTING MORE INFORMATION

22. 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, [Website URL].

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: [Email Address]

Toll-Free: 1-[XXX-XXX-XXXX]

Mail: *Physicians to Women, Inc. and Mid-Atlantic Women's Care, PLC*, Security Incident Settlement Administrator, [address]

Publicly filed documents can also be obtained by visiting the Roanoke Courthouse of the United States District Court for the Western District of Virginia or by reviewing the Court's online docket. For those planning to visit the Court for more information, please contact the Court for its regular business hours and for any costs associated with obtaining documents maintained by the Court.

You may also contact your counsel in this matter, the Settlement Class

Counsel, as follows:

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PLEASE DO NOT CONTACT THE COURT, PHYSICIANS TO

WOMEN INC. OR MID-ATLANTIC WOMEN'S CARE, PLC.