

# Exhibit E

# **If Jim Koons Management Company, dba, Jim Koons Automotive Company Notified You of a Data Security Incident, You May be Eligible for Payment from a Class Action Settlement**

*Si desea recibir esta notificación en español, llámenos o visite nuestra página web*

A proposed Settlement has been reached in a class action lawsuit known as *Morelli v. Jim Koons Management Company*, Case No. 8:22-cv-00292 (D. Md.). This lawsuit arises out of a data breach which was discovered by Jim Koons Management Company dba, Jim Koons Automotive Company (“Koons or Defendant”) on or about June 5, 2021 and announced on or around January 14, 2022 (the “Data Security Incident”). The information that may have been accessed in the Data Security Incident includes full names, addresses, Social Security numbers, driver’s license numbers, and financial account information of consumers stored on its private network, (collectively, called “PII”) Defendant disagrees with Plaintiffs’ claims.

## **WHO IS INCLUDED?**

You are included in this Settlement as a Settlement Class Member if Koons sent a “Notice of Security” letter to you, dated on or about January 14, 2022, which indicated your PII was potentially accessed as a result of Data Security Incident.

## **WHAT DOES THE SETTLEMENT PROVIDE?**

Settlement Class Members can receive the following benefits from the Settlement: (1) up to \$500 for documented out-of-pocket expenses, (2) reimbursement for up to three (3) hours of lost time spent dealing with the Data Incident (\$20 per hour), and (3) for a Settlement Class Member who was the victim of actual documented identity theft reimbursement for extraordinary losses up to \$4,500 for documented expenses. Defendant also agrees to update business practices and enhance security. Defendant will pay a \$100 cash benefit to Settlement Class Members who were sent the “Notice of Security” letter dated on or about January 14, 2022, to a California address and who submit a timely claim. Settlement Class Members may also claim 2-years of credit monitoring through Equifax, and those Settlement Class Members who signed up for the credit monitoring previously offered will automatically receive a two-year extension of that credit monitoring.

**The only way to receive benefits from the proposed Settlement is to file a claim.** Claim Forms may be submitted online or mailed to the Settlement Administrator at: In re \_\_\_\_\_, c/o Kroll Settlement Administration, P.O. Box \_\_\_\_\_, New York, NY 10150-5391. The deadline to file a claim is \_\_\_\_\_.

## **WHAT ARE YOUR OPTIONS?**

- **Do nothing.** You will not receive any benefits from the Settlement. You will be legally bound by decisions of the Court and you give up your right to sue the Defendant relating to the claims resolved by this Settlement.
- **Exclude Yourself.** If you do not want to be included in the Settlement, you must submit a written request to the Settlement Administrator, Settlement Class Counsel, and Defendants’ Counsel by **Month 00, 2022**. You will keep your right to sue Defendants about the claims in this case, but you will not receive money. Detailed instructions on how to exclude yourself are found on \_\_\_\_\_.
- **Object/Comment.** You have the right to object to or comment on the Settlement and still get benefits. If you want to object to or tell the Court what you think about the Settlement, you must submit your objection/comment in writing by **Month 00, 2022**. Detailed instructions on how to object or comment are found on \_\_\_\_\_.

The Court has scheduled a Final Fairness Hearing for the Settlement of this case on [Month, day, year] \_\_\_\_\_ to consider: 1) whether to approve the Settlement; 2) any objections; 3) the requests for awards to the Settlement Class Representatives; and 4) the request for an award of attorneys’ fees of up to \$265,000 and class representative costs of \$2,500 each. You may attend the Final Approval Hearing and ask to be heard by the Court, but you do not have to attend.

This is only a summary. For more information about the settlement and benefits, visit \_\_\_\_\_, call \_\_\_\_\_.