

# Exhibit E

COURT AUTHORIZED NOTICE OF CLASS  
ACTION AND PROPOSED SETTLEMENT

OUR RECORDS INDICATE  
THAT, WHILE A STUDENT,  
YOU OR A MINOR FOR  
WHOM YOU HAVE A  
LEGAL RESPONSIBILITY  
LOGGED INTO NAVIANCE  
AND MAY BE ENTITLED  
TO A PAYMENT FROM A  
CLASS ACTION  
SETTLEMENT.

*Q.J. v. PowerSchool Holdings LLC*  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

<<Refnum Barcode>>

Postal Service: Please do not mark barcode

Student Class Member ID: <<Refnum>>  
<<Student First Name>> <<Student Last Name>>  
<<Guardian First Name>> <<Guardian Last Name>>  
<<Address 1>>  
<<Address 2>>  
<<City>>, <<St>> <<Zip>> <<-Zip4>>

A settlement has been reached in a class action lawsuit against PowerSchool Holdings LLC (“PowerSchool Holdings”); Hobsons, Inc. (“Hobsons”); Heap Inc. (“Heap”); and the Board of Education of the City of Chicago (“CPS”) (collectively, the “Defendants”). The class action lawsuit seeks to recover against the Defendants for their alleged roles in the alleged non-consensual interception of students’ confidential and sensitive communications while using education technology products offered by Hobsons and, later, PowerSchool Holdings, including a product commonly referred to as Naviance (the “Naviance Platform”). The class action lawsuit alleges violations of the Electronic Communications Privacy Act (“ECPA”), 18 U.S.C. § 2511(a); the California Invasion of Privacy Act (“CIPA”), Cal. Penal Code §§ 631-632; the Illinois Eavesdropping Act (“IEA”), 720 Ill. Comp. Stat. 5/14-1, *et seq.*; the Stored Communications Act (“SCA”), 18 U.S.C. § 2702(a)(1); the Illinois School Student Records Act (“ISSRA”), 5 Ill. Comp. Stat. 10/1, *et seq.*; and common law. The Defendants deny violating any law but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

**Am I a Settlement Class Member?** Our records indicate you or a minor for whom you have legal responsibility may be a member of the Settlement Class. Settlement Class Members are all persons in the United States who, while a student, logged into the product offered by Hobsons and, later, PowerSchool Holdings, that is commonly referred to as Naviance (the “Naviance Platform”), at least once during the period beginning on August 18, 2021 and continuing through January 23, 2026. If you have legal responsibility for multiple minor students in the Settlement Class, you may receive multiple Notices containing a unique Student Class Member ID for each student.

**What Can I Get?** If approved by the Court, the Defendants will establish a Settlement Fund of \$17,250,000 to pay all valid claims submitted by the Settlement Class, together with the cost to administer the settlement, the cost to inform people about the settlement, attorneys’ fees, costs, and expenses, and a service award to the Class Representative. If you are entitled to relief, you may submit a claim to receive a *pro rata* (meaning equal) share of the Settlement Fund. The settlement also requires the Defendants to provide various forms of prospective relief, which is detailed in the operative settlement agreement and can be found at [www.powerschoolnaviancesettlement.com](http://www.powerschoolnaviancesettlement.com) (the “Settlement Website”).

**How Do I Get a Payment?** You must submit a timely and complete Claim Form **no later than [DATE]**. You can file a claim either electronically on the Settlement Website by visiting [www.powerschoolnaviancesettlement.com](http://www.powerschoolnaviancesettlement.com), or by printing and mailing in a paper Claim Form, copies of which are available for download at the Settlement Website. Your payment will come by check unless you submit your claim online and elect to receive payment electronically. One claim may be submitted per Student Class Member ID (located on the front of this Notice).

**What are My Other Options?** You may exclude yourself from the Settlement Class by sending a written request to the Settlement Administrator, which must be postmarked or received no later than **[DATE]**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. If you do not exclude yourself, you and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your written objection must be filed no later than **[DATE]**. Specific instructions about how to object to, or exclude yourself from (or “opt out” of), the settlement are available at [www.powerschoolnaviancesettlement.com](http://www.powerschoolnaviancesettlement.com). If you file a claim or do nothing, and the Court approves the settlement, you will be bound by all of the Court’s orders and judgments. In addition, all of your claims relating to the Defendants’ acts and/or omissions will be released.

**Who Represents Me?** The Court has appointed Scott R. Drury of Drury Legal, LLC, to represent the Settlement Class. This attorney is called Class Counsel. You will not be charged for Class Counsel. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

**When Will the Court Consider the Proposed Settlement?** The Court will hold the Final Approval Hearing at **[TIME] CT on [DATE]**, in Courtroom 1903 at the Everett McKinley Dirksen U.S. Courthouse, 219 South Dearborn Street, Chicago, IL 60604. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; determine the fairness of the settlement; decide whether to approve Class Counsel’s request for attorneys’ fees and reimbursement of costs and expenses; and decide whether to award the Class Representative up to \$5,000 as a service award from the Settlement Fund for his service in helping to bring and settle this case. Class Counsel may request reasonable attorneys’ fees in an amount not to exceed 37% of the Settlement Fund, less Settlement Administration Expenses, litigation costs and expenses, and any service award, but the Court may award less than this amount. Class Counsel may also seek reimbursement of reasonable costs and expenses, as approved by the Court.

**How Do I Get More Information?** For more information, including the full Notice, Claim Form, and the operative settlement agreement go to [www.powerschoolnaviancesettlement.com](http://www.powerschoolnaviancesettlement.com), contact the Settlement Administrator at **(833) 447-8852** or *Q.J. v. PowerSchool Holdings LLC*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.