

Exhibit E

From:

To:

Subject: Email Notice of Proposed Class Action Settlement

Class Member ID: <<RefNum>>

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

*Ganesh Sankar, Erika Titus-Lay, Jared Cavanaugh, and Kimberly Vongnalith v.
California Northstate University, LLC*
Lead Case No. 2:24-cv-00473-DAD-JDP

To all persons in the United States whose Private Information was potentially accessible as a result of the Data Incident, including those who were sent notification from Defendant that their Private Information was potentially accessible as a result of the Data Incident, a proposed class action settlement may affect your rights

Why am I receiving this Notice? You are receiving this Notice because the records of California Northstate University, LLC (Defendant) show your Private Information was potentially accessible as a result of the Data Incident that occurred on or about February 12, 2023. Defendant's investigation determined that between February 12, 2023, and February 13, 2023, an unauthorized actor potentially accessed and obtained certain files stored on Defendant's servers. Following a review of the files that were impacted, Defendant determined that information which may have been involved potentially included its current, former, and prospective students' and employees' names in combination with their Social Security Numbers. You are therefore likely a Settlement Class Member eligible to receive Settlement Class Member Benefits under this Settlement.

Who is a Settlement Class Member? You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is a person in the United States whose Private Information was potentially accessible as a result of the Data Incident, including those who were sent notification from Defendant that their Private Information was potentially accessible as a result of the Data Incident.

What are the Settlement Class Member Benefits? Settlement Class Members who submit a Valid Claim may receive: (a) Cash Payment A – Documented Losses, up to **\$5,000** per Settlement Class Member, with supporting documentation; or (b) Cash Payment B – Flat Cash Payment – an estimated **\$100** Settlement Class Member Benefit; and in addition to a Cash Payment (c) Credit Monitoring for **one (1) year of Credit Monitoring** with three credit bureaus that will provide the following benefits: three-bureau credit monitoring, dark web monitoring, identity theft insurance coverage for up to \$1,000,000, and fully managed identity recovery services. Please visit www.website.com for a full description of the Settlement Class Member Benefits and documentation requirements. Cash Payments to Settlement Class Members will be subject to a *pro rata* increase from the Settlement Fund in the event the amount of Valid Claims is insufficient to exhaust the entire Settlement Fund. Similarly, in the event the amount of Valid Claims exhausts the amount of the Settlement Fund, the amount of the Cash Payments may be reduced *pro rata* accordingly.

How do I submit a Claim Form for benefits? You must submit a Claim Form, available at www.website.com to be eligible to receive a Settlement Class Member Benefit. Your completed Claim Form must be submitted online or mailed to the Settlement Administrator at <<Mailing Caption>>, c/o Kroll Settlement Administration LLC, PO Box XXXX, New York, NY 10150-XXXX and postmarked, by **DATE**.

What are my other options? If you **Do Nothing**, you will be legally bound by the terms of the Settlement, and you will release your claims against Defendant and other Released Parties as defined in the Settlement Agreement. You may **Opt-Out** of or file an **Objection** to the Settlement and/or Application for Attorneys' Fees, Costs and Service Awards by <<Objection Period>>. Please visit www.website.com for more information on how to submit an opt-out request and exclude yourself from or object to the Settlement.

Do I have a Lawyer in this Case? Yes, the Court appointed Kristen Lake Cardoso of Kopelowitz Ostrow P.A., Leanna A. Loginov of Shamis & Gentile, P.A., Scott Edelsberg of Edelsberg Law, P.A., and Cassandra P. Miller of Strauss Borrelli PLLC to represent you and other Settlement Class Members. 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.

The Court's Final Approval Hearing. The Court is scheduled to hold a Final Approval Hearing on **DATE** at **TIME** PT, to consider whether to approve the Settlement, the attorneys' fees and expenses, not to exceed 25% of the Settlement Fund (approximately \$100,000) for Class Counsel, plus reimbursement costs and Service Award payments of \$2,000 to each Class Representative. You may appear at the hearing, either yourself or through an attorney hired by you, but you don't have to.

This Email Notice is only a summary. For more information or to change your address, visit www.website.com or call toll-free (XXX) XXX-XXXX

a. **PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT OR CLASS COUNSEL FOR INFORMATION ABOUT THE CLASS ACTION SETTLEMENT**

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