

Tiller, et al. v. Hilb Group
Operating Company, LLC
c/o Settlement Administrator
PO Box XXXX

FIRST-CLASS MAIL
U.S. POSTAGE PAID
CITY, ST
PERMIT NO. XXXX

**NOTICE OF CLASS ACTION
SETTLEMENT**

**If you received a notice of data
security incident letter from Hilb
Group Operating Company, LLC, you
are entitled to submit a claim for
monetary compensation under a
class action settlement.**

www.hgdatasettlement.com

<<Barcode>>

Class Member ID: <<Refnum>>

<<FirstName>> <<LastName>>

<<BusinessName>>

<<Address>>

<<Address2>>

<<City>>, <<ST>> <<Zip>>.<<zip4>>

WHO IS A CLASS MEMBER?

In the lawsuit *Tiller, et al. v. Hilb Group Operating Company, LLC*, No. 3:23-cv-759 (E.D. Va.), you are a class member if you were subject to, and previously received a Notice Letter notifying you of, the Security Incident that Hilb Group Operating Company, LLC (“Hilb Group”) discovered in January 2023 (the Court’s decision because this is a conditionally certified class action, “Settlement Class”).

WHAT ARE THE SETTLEMENT BENEFITS AND TERMS?

Under the Settlement, Hilb Group has agreed to pay \$1,600,000 into a Qualified Settlement Fund which will be distributed to Class Members who submit valid claims, after deducting the named Plaintiffs’ Service Awards, class counsel’s attorneys’ fees and expenses, and settlement administration notice and lawsuit administration costs, if such award is approved by the Court. All Class Members this litigation and reviewed and approved the terms of the proposed Settlement, may submit claims to receive Pro Rata Cash Payments estimated to be approximately \$75. In addition to these cash payments, Class Members who believe they suffered out-of-pocket losses as a result of the Security Incident may claim up to \$5,000 (subject to pro rata adjustment) for the reimbursement of sufficiently documented expenses. Claims for the estimated \$75 cash payment option will be pro rata adjusted up or down based on the remaining balance of the Settlement Fund after payments for valid Out-of-Pocket Loss settlement administration costs and expenses, attorneys’ fees and expenses, and any class representative service awards. Hilb Group has also agreed to implement or continue a series of cybersecurity enhancements to limit the likelihood of a future cyberattack. You must timely submit a valid Claim Form to receive it is filed with the Court compensation from the \$1,600,000 Settlement Fund. More information about the types of Claims and how to file them is available at the Settlement Website.

WHAT ARE YOUR RIGHTS AND OPTIONS?

Submit a Claim Form. To qualify for a cash payment, you must timely mail a Claim Form that is attached to this notice or timely complete and submit a Claim Form online at www.hgclasssettlement.com (“Settlement Website”). Your Claim Form must be postmarked or submitted online no later than _____, 2024. Kroll Administration, LLC is the Settlement Administrator.

Opt Out. You may exclude yourself from the settlement and retain your ability to sue Hilb Group on your own by mailing a written request for exclusion to the Settlement Administrator that is post marked no later than _____, 2024. If you do not exclude yourself, you will be bound by the settlement and give up your right to sue regarding the released claims.

Object. If you do not exclude yourself, you have the right to object to the settlement.

Written objections must be signed, postmarked no later than _____, 2024, and provide the reasons for the objection. Please visit the Settlement Website for more details. **Do Nothing.** If you do nothing, you will not receive a Settlement payment and will lose the right to sue regarding the released claims. You will be bound by the Court’s decision because this is a conditionally certified class action.

Attend the Final Approval Hearing. The Court will hold a **Final Approval Hearing on _____, 2025 at [time].** All persons who timely object to the settlement

may appear at the Final Approval Hearing. **Who are the Class Representatives?** Mullaam Haitez, Gabrielle Crowley, Benny Greene, Laura Fasolo, and Leigh Tiller are the Plaintiffs and Class Representative in this case. **Who are the attorneys for the Plaintiffs and the proposed Class?** Class Counsel is Terence R. Coates, Markovits, Stock & DeMarco, LLC.

Do I have any obligation to pay attorneys’ fees or expenses? No. The attorneys’ fees and expenses will be paid exclusively from the Settlement Fund as awarded and approved by the Court. The attorneys’ fees will be in an amount not to exceed 1/3 of the \$1,600,000 Settlement Fund (i.e. no more than \$533,333.33) and the expenses will not exceed \$30,000. **The motion for attorneys’ fees and expenses will be posted on the Settlement Website after** _____, 2025 at [time].

When is the Final Approval Hearing? The final approval hearing, where the Court will determine if the settlement is fair, reasonable, and adequate, will be conducted on _____, 2025 at [time].

Who is the Judge overseeing this settlement? Judge John A. Gibney, Jr., United States District Judge, Eastern District of Virginia.

Where may I locate a copy of the settlement agreement, learn more about the case, or learn more about submitting a Claim? www.hgdatasettlement.com.

*** Please note that if you wish to submit a claim for compensation for Out-of-Pocket losses on the attached Claim Form, you will likely need to submit your request to the claim online so you may attach all information necessary to support your request for such out-of-pocket losses. If you wish to receive just the Pro Rata Cash Payment, the attached tear off claim form should suffice. A longer version of the Claim Form may be accessed on the Settlement Website.

This Notice is a summary of the proposed settlement.

BRM
Postage

Tiller, et al. v. Hilb Group
Operating Company, LLC
c/o Kroll Settlement
Administration, LLC
PO Box XXXX
(city, state, zip code)

< < B a r c o d e > > Class
Member ID: <<Refnum>>

CLAIM FORM

Claims must be postmarked no later than [REDACTED], 2024 You may also submit a Claim Form online no later than [REDACTED], 2024.

NAME: _____ EMAIL: _____

ADDRESS: _____

Monetary Compensation: All Class Members may submit claims to receive Pro Rata Cash Payments estimated to be approximately \$75. In addition to these cash payments, Class Members who believe they suffered out-of-pocket losses as a result of the Security Incident may claim up to \$5,000 (subject to pro rata adjustment) for the reimbursement of sufficiently documented expenses. You may claim one or both settlement benefits. However, if you wish to make a claim for out-of-pocket losses, you must either do so by filing a claim online, or by printing the full claim form found on the settlement website and submitted via mail. This is because of the need to submit supporting documentation for this claim.

YOU MAY ONLY USE THIS CLAIM FORM FOR THE PRO RATA CASH PAYMENT.

Pro Rata Cash Payment: Would you like to receive a cash payment under the Settlement? (circle one) Yes No

If you are a Settlement Class Member, you may receive an estimated \$75 cash payment, which may be increased or decreased *pro rata* from funds remaining in the Qualified Settlement Fund after all claims are submitted.

Select from one of the following payment options:

*PayPal _____ *Venmo _____ *Zelle _____ *Virtual Prepaid Card _____ (requires an email address) Check _____
*Please provide your email address or phone number associated with your PayPal, Venmo or Zelle account, or email address for the Virtual Prepaid card: _____

By signing my name below, I swear and affirm that the information included on this Claim Form is true and accurate, and that I am completing this claim form to the best of my personal knowledge. _____ (signature)