

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MONIQUE SANDERS, DARLA SOICH,
and CHRISTOPHER HARRISON,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

IBEX GLOBAL SOLUTIONS, INC., and
IBEX LIMITED,

Defendants.

Case No. 1:22-cv-00591-TNM

**DECLARATION OF WILLIAM B. FEDERMAN IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT**

I, William B. Federman, declare under penalty of perjury as follows:

1. I am an attorney duly admitted to the Bars of the states of Oklahoma, Texas, and New York. I am a founder and member of the law firm Federman & Sherwood. Federman & Sherwood and Murphy Law Firm are Class Counsel for Plaintiffs in the above referenced action. I submit this declaration in support of Plaintiffs' Unopposed Motion for Final Approval of Settlement (filed contemporaneously herewith).

I. THE SETTLEMENT IS FAIR, REASONABLE, AND ADEQUATE

1. On October 24, 2022, Plaintiffs Monique Sanders, Darla Soich, and Christopher Harrison ("Plaintiffs"), on behalf of themselves and all other members of the putative class, and Defendant Ibox Global Solutions, Inc. and Defendant Ibox Limited ("Defendants" or "Ibox")

(collectively, the “Parties”) reached an agreement to settle this Action pursuant to the terms of the Settlement Agreement and Release (the “Settlement Agreement”).¹

2. Through the Settlement, Defendants will pay \$2,400,000.00 into a *non-reversionary* Settlement Fund in exchange for the resolution of this Action. From that Settlement Fund, Settlement Class Members will be eligible to submit claims for: (i) five (5) years of Experian credit monitoring and identity protection, including identity theft insurance; (ii) reimbursement for Out-of-Pocket Losses (up to \$5,000 per Settlement Class Member); and (iii) reimbursement for up to five (5) hours for time spent responding to the Data Incident at a rate of \$25.00 an hour (for a total up to \$125.00 per class member). Settlement Class Members may submit a claim for any combination of the above, however, each Settlement Class Member’s claim for cash payment is subject to an individual aggregate cap of \$5,000 per Class Member and potential pro rata distribution in the event the payment of all claims would exceed the Settlement Fund.² In the event there are funds remaining in the Settlement Fund after all payments and distributions, each Settlement Class Member who filed a valid claim will receive a pro rata residual cash payment of up to \$95.00 per claimant. Any funds remaining thereafter will be donated to *cy pres* recipient National Cybersecurity Alliance, a non-profit organization that promotes effective cybersecurity measures and practices. Accordingly, the Settlement provides a very favorable result for the Class.

3. The Settlement was the result of hard-fought arm’s length negotiations between competent and experienced counsel. The negotiations involved extensive back and forth between

¹ All capitalized terms shall have the definitions set forth in the Settlement Agreement, attached as Exhibit A to the Declaration of William B. Federman in Support of Plaintiffs’ Motion for Preliminary Approval of Settlement (ECF No. 24-1).

² While the claims period is ongoing, all indications based on the early claims data are that the Settlement Fund will be able to provide full benefits to valid claimants (without any pro rata reductions) and will even have sufficient funds to distribute residual cash payments to claimants.

the Parties, which spanned the course of several months. Indeed, it was only after two unsuccessful mediation sessions with Honorable John W. Thornton (Ret.) that Judge Thornton presented a mediator's proposal, which was accepted by both parties.

4. By the time the Parties reached an agreement of settlement in principle, Plaintiffs and their Counsel were well informed about the strengths and weaknesses of the Action. Indeed, the Settlement was achieved only after: a thorough pre-complaint investigation that culminated in the preparation of a detailed complaint filed in this Action; the exchange of relevant informal discovery; the preparation of a detailed mediation statement that included factual and legal analysis as well as a proposed settlement term sheet; the review and consideration of defendants' mediation statement; numerous discussions with Plaintiffs concerning possible settlement terms; two full-day mediation sessions with Honorable John W. Thornton (Ret.), both of which went well into evening hours; and weeks of intense settlement negotiations that included candid exchanges of information facilitated by Judge Thornton about the Data Incident, potential damages, and the input of Plaintiffs.

5. While I believe Plaintiffs' case against Defendants is strong, there would be many hurdles to overcome in a case of this size and scope, including: class certification, *Daubert* motions, summary judgment, trial, and appeals, which could all potentially impede Plaintiffs' ability to secure a recovery for the Class. The Settlement confers immediate and substantial benefits on the Settlement Class without the delay of protracted litigation that could last years. At the same time, the certainty of the Settlement eliminates the risk that continued litigation might yield little or nothing for the Class given the difficulties of obtaining class certification and establishing liability and damages.

6. Therefore, it is my opinion that the Settlement achieved here represents an excellent result considering the significant benefits to the Settlement Class as well as the risks and delays attendant to further protracted litigation.

7. My opinion is informed by my years of experience litigating complex class actions, including data breach class actions. Indeed, Class Counsel and Liaison Counsel have successfully prosecuted and settled numerous data breach class actions, consumer class actions, and other complex litigation throughout the country. *See* ECF No. 28-1 at Exhibits A–C (resumes of Class Counsel and Liaison Counsel); *see also* Order Granting Preliminary Approval of Class Action Settlement and Approving Notice Program, ¶ 7, ECF No. 25 (Court appointing Federman & Sherwood and Murphy Law Firm as Class Counsel after finding “Class Counsel is well-qualified and experienced.”).

8. Class Counsel were instrumental in researching the case, developing the factual background and claims, working with counsel for Defendants to facilitate exchanges of relevant information, and ultimately settling the case. After the Settlement was reached and presented the Court, Class Counsel has continued to devote effort towards this litigation on behalf of the Class. Among other things, Class Counsel have reviewed extensive confirmatory discovery provided by Ibex. Class Counsel’s consideration of these documents only bolsters my opinion that the Settlement is fair, reasonable, and adequate, and in the best interests of the Class.

II. THE NOTICE TO THE CLASS SATISFIES DUE PROCESS

9. The Notice program was structured to fulfill all requirements of Due Process while remaining straight-forward and easy to understand.

10. Pursuant to the Settlement Agreement, and following the entry of the Preliminary Approval Order, Defendants provided the Settlement Class List to the Settlement Administrator.

11. Class Counsel instructed the Settlement Administrator to begin disseminating copies of the Postcard Notice and Postcard Claim Form by direct mail in accordance with the Preliminary Approval Order. The Settlement Administrator then sent each Settlement Class Member the Postcard Notice and the Postcard Claim Form within thirty (30) days of the entry of the Preliminary Approval Order. *See* Declaration of Ryan Aldridge Regarding Status Notice and Settlement Administration (“Aldridge Decl.”), attached hereto as **Exhibit 1**, at ¶ 7. The Settlement Administrator re-mailed Postcard Notices and Claim Forms to Class Members for which the initial Postcard Notice was returned or undeliverable but for which the Settlement Administrator was able to obtain an alternative mailing address through skip tracing, forwarding information, or other means. *Id.*, ¶ 10. In addition, the Settlement Administrator successfully delivered email notices to an additional 1,948 Settlement Class Members for whom the initial Postcard Notice was returned or undeliverable. *Id.*, ¶ 11. Through these means, the Settlement Administrator was able to successfully provide direct notice to 154,269 Settlement Class Members, representing 86.9% of the Settlement Class. Aldridge Decl., ¶ 17. The Settlement also received coverage from various media outlets, which provided further notice to Settlement Class Members.³

12. In accordance with the Preliminary Approval Order, the Settlement Administrator established a dedicated settlement website, <https://www.ibexdatasettlement.com>, to provide Settlement Class Members with information concerning the Settlement, the ability to access downloadable copies of the Notice and copies of the Settlement Agreement, and the ability to submit claim forms online. The Settlement Administrator has additionally established a toll-free

³ *See, e.g.*, <https://topclassactions.com/lawsuit-settlements/privacy/data-breach/ibex-data-breach-2-4-million-class-action-settlement/>; *see also* <https://www.the-sun.com/money/7022961/data-breach-settlement-claim/>.

telephone number for Settlement Class Members to obtain information about the Settlement and/or seek other assistance.

13. The Court-approved Notice explains the background and terms of the Settlement and provides members of the Settlement Class with the date of the final approval hearing. The Notice also provides Settlement Class Members with an explanation of the Settlement, the Settlement benefits, the requests for fees and expenses of Plaintiffs' Counsel and service award to Plaintiffs, and the rights and options of Settlement Class Members (including the right to object to the settlement or exclude themselves from the settlement).

III. THE POSITIVE RESPONSE FROM THE SETTLEMENT CLASS

14. The deadline for Class Members to request exclusion from the Settlement Class or to object to the Settlement passed on February 17, 2023. Absolutely *no* Settlement Class Member objected to any aspect of the Settlement, the request for attorneys' fees and expenses, or the service awards to Plaintiffs. Moreover, *no* Class Member sought exclusion from the Settlement Class.

15. In contrast, with nearly a month remaining before the claims deadline, 2.0% of the Settlement Class have already submitted claims. The number of claims is expected to grow before the March 20, 2023 claims submission deadline, particularly given that reminder notices were mailed out this week. Aldridge Decl., ¶ 12. That claims are already at 2.0% compares favorably to the claims rates in other data breach class action settlements, as evidenced in the below chart:

Case	Claims Rate
<i>In re Target Corp. Customer Data Sec. Breach Litig.</i> , No. 14-md-2522, 2017 WL 2178306, at *1–2 (D. Minn. May 17, 2017), <i>aff'd</i> , 892 F.3d 968 (8th Cir. 2018)	0.23 %
<i>In re Hudson's Bay Co. Data Sec. Incident Consumer Litig.</i> , No. 18-CV-8472 (PKC), 2022 WL 2063864, at *10 (S.D.N.Y. June 8, 2022)	0.25 %
<i>Corona v. Sony Pictures Entmt., Inc.</i> , No. 2:14-cv-9600 (C.D. Cal. Apr. 12, 2016), ECF Nos. 164, 166	0.7 %
<i>In re Anthem, Inc. Data Breach Litig.</i> , 327 F.R.D. 299, 321 (N.D. Cal. 2018)	1.8 %

16. Overall, the response from the Settlement Class has been extremely positive, which demonstrates Class Members' approval of the Settlement.

IV. CONCLUSION

17. In my professional opinion, the Settlement represents an excellent result for the Settlement Class and merits final approval.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2023

/s/ William B. Federman
William B. Federman
FEDERMAN & SHERWOOD

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MONIQUE SANDERS, DARLA SOICH,
AND CHRISTOPHER HARRISON,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

IBEX GLOBAL SOLUTIONS, INC., and
IBEX LIMITED,

Defendant.

Case No. 1:22-CV-00591-TNM

**DECLARATION OF RYAN ALDRIDGE REGARDING THE STATUS OF NOTICE AND SETTLEMENT
ADMINISTRATION**

I, Ryan Aldridge, hereby declare and verify as follows:

I. INTRODUCTION

1. ***Personal Information.*** I am an Associate Director for Postlethwaite & Netterville, APAC (“P&N”). P&N was retained as the Settlement Administrator in this case, and, as the Project Manager over this Settlement, I am personally familiar with the facts set forth in this declaration.
2. ***The Capacity and Basis of this Declaration and Verification.*** I am over the age of 21. Except as otherwise noted, the matters set forth in this Declaration are based upon my personal knowledge, information received from the parties in this proceeding, and information provided by my colleagues at P&N and our partners.

II. BACKGROUND

3. **Preliminary Approval.** On November 18, 2022, the Court entered its order preliminarily approving the Settlement Agreement and the appointment of P&N as Settlement Administrator. After the Court's preliminary approval of the Settlement, P&N began to implement and coordinate the Notice program.
4. **The Purpose of this Declaration and Verification.** I submit this Declaration to evidence P&N's compliance with the Preliminary Approval Order terms and to detail P&N's execution of its role as the Settlement Administrator.

III. CLASS ACTION FAIRNESS ACT ("CAFA")

5. **CAFA Notice.** On December 2, 2022, pursuant to 28 U.S.C. §1715, P&N, on behalf of the Defendants, caused Notice of this settlement and related materials to be sent to the Attorneys General of all U.S. states, as well as the Attorney General of the United States. As of February 23, 2023, P&N has not received any objection or any other response from any Attorney General. A copy of the CAFA Notice and mail list are attached as **Exhibit A**.

IV. CLASS ACTION NOTICE PROGRAM EXECUTION

6. **Notice Database.** P&N maintains a database of 177,463 Settlement Class Members which was used to effectuate the notice campaign as outlined within the Settlement Agreement. P&N received two Excel files from Ibex containing the class data on November 28, 2022. One file contained 177,468 records representing the full Settlement Class List. The second file contained 32,838 records representing a subset of the Settlement Class List to which prior correspondence to the Settlement Class Members had been returned as undeliverable. P&N reviewed and de-duplicated the data files provided based on name and address and

determined that 177,463 unique Settlement Class Members existed to which Notice should be issued as outlined within the Settlement Agreement.

7. **Mail Notice.** P&N coordinated and caused the Postcard Notice and Postcard Claim Form to be mailed via First-Class Mail to Settlement Class Members for which a mailing address was available from the class data. The Postcard Notice included: (a) the web address to the Settlement Website for access to additional information, (b) rights and options as a Settlement Class Member and the dates by which to act on those options, the requested attorneys' fees, and (c) the date of the Final Approval Hearing. The notice mailing was completed on or before December 19, 2022 in accordance with the Preliminary Approval Order. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit B**, with a copy of the Long Form Notice and Claim Form.
8. **Undeliverable List.** Prior to mailing, P&N performed a skip trace search on the 32,838 records identified in the Undeliverable List to attempt to identify an alternative mailing address. The skip trace search returned 21,062 alternative addresses to use for the notice mailing.
9. **Mailing Address Validation.** Prior to the mailing, all mailing addresses were checked against the National Change of Address (NCOA) database maintained by the United States Postal Service ("USPS"). In addition, the addresses were certified via the Coding Accuracy Support System (CASS) to ensure the quality of the zip code and verified through Delivery Point Validation (DPV) to verify the accuracy of the addresses. Of the 177,463 Class Member records, 756 records did not successfully pass the address validation procedures noted above.

10. **Mail Notice Delivery.** In the initial mailing campaign, P&N executed mailings to 176,707 Class Members that passed address validation. P&N executed skip tracing on the 756 records that did not pass address validation and was able to mail Postcard Notice to an additional 297 Class Members. P&N also executed supplemental mailings for 12,464 Class Members for which the initial Postcard Notice was not deliverable but for which P&N was able to obtain an alternative mailing address through: (1) forwarding addresses provided by the USPS, (2) skip trace searches using the LexisNexis third-party vendor database, or (3) requests received directly from Settlement Class Members. Mail notice delivery statistics are detailed in Section 17 below.
11. **Email Notice Delivery.** On or about January 18, 2023, P&N provided Class Counsel and Counsel for Ibex with a list of the Settlement Class Members to whom the Notice was returned and/or was undeliverable (“Undeliverable Notice List”). Counsel for Ibex provided P&N with one Excel file containing the full Settlement Class List with email addresses for 15,171 records. P&N performed a cross reference of the email addresses provided to the Undeliverable Notice List and determined 2,517 Settlement Class Members existed to which notice should be issued via email as outlined within the Settlement Agreement. On February 2, 2023, P&N caused email notice to be sent to the 2,517 email addresses. Ultimately, the email notice was successfully delivered to 1,948 email addresses, or 77.4% deliverability. A true and correct copy of the Email Notice sent to those identified on the Class Notice List is attached hereto as **Exhibit C**.
12. **Reminder Notice.** On or about February 10, 2023, P&N identified 152,019 Settlement Class Members who had not yet submitted a Claim Form and whose Postcard Notice was not returned undeliverable. Class Counsel requested reminder mail notices to be sent to this list

of Settlement Class Members. P&N commenced mailing the reminder notice on February 20, 2023. All reminder notice mailings are expected to be complete by February 24, 2023.

13. **Settlement Post Office Box.** P&N maintains the following Post Office Box (the “P.O. Box”) for the Settlement Program:

Ibex Data Security Settlement Administrator
c/o Postlethwaite & Netterville
PO Box 1908
Baton Rouge, LA 70821

This P.O. Box serves as a location for the USPS to return undeliverable program mail to P&N and for Settlement Class Members to submit Exclusion Requests and other settlement-related correspondence. The P.O. Box address appears prominently in all Notices and in multiple locations on the Settlement Website. P&N monitors the P.O. Box daily and uses a dedicated mail intake team to process each item received.

14. **Settlement Website.** On December 19, 2022, P&N published the Settlement Website, www.IbexDataSettlement.com. Visitors to the Settlement Website can download the Long Form Notice (English and Spanish), Claim Form (English and Spanish), as well as court documents, such as the Class Action Complaint, Settlement Agreement, motions filed by Class Counsel, and orders of the Court. Visitors are also able to submit claims electronically, download a Claim Form to submit by mail, and find answers to frequently asked questions (FAQs), important dates and deadlines, and contact information for the Settlement Administrator. As of February 23, 2023, the Settlement Website received 9,448 unique visits.

15. **Toll-Free Number.** P&N established a toll-free telephone number, 1-877-659-6287 (the “Toll-Free Number”), which is available twenty-four hours per day. Settlement Class

Members can call and interact with an interactive voice response (“IVR”) system that provides important settlement information and offers the ability to leave a voicemail message to address specific requests or issues. The Toll-Free Number appeared in all Notices, as well as in multiple locations on the Settlement Website. The Toll-Free Number will remain active through the close of this Settlement Program.

16. **Email Support.** P&N established an Email address, info@IbexDataSettlement.com, to provide an additional option for Settlement Class Members to address specific questions and requests to the Settlement Administrator for support.

V. NOTICE PROGRAM REACH

17. **Notice Reach Results.** Through the Notice procedures outlined above, P&N attempted to send direct Notice to 177,463 (100%) Settlement Class Members. As of February 23, 2023, the Notice Program reached a total of 154,269 (86.9%) of Settlement Class Members.¹ Table 1 below provides an overview of dissemination results for the Notice Program and reach statistics for the Notice Program.

¹ A Settlement Class Member is considered “reached” by direct Notice if a Postcard Notice mailed to the Settlement Class Member has not been returned by the USPS as undeliverable or, if a Postcard Notice mailed to the Settlement Class Member was returned by the USPS as undeliverable, either (1) a subsequent Postcard Notice was mailed to an alternative mailing address for the Settlement Class Member and was not returned, or (2) Email Notice was successfully sent to the Settlement Class Member and was not returned.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume of Class Members	Percentage of Class Members (%)
Class Members	177,463	100.00%
Initial Notice Mailing		
(+) Postcard Notices Mailed (Initial Campaign)	176,707	99.6%
(+) Postcard Notices Mailed (Initial Skip Traces)	297	0.2%
(-) Total Postcard Notices Returned as Undeliverable	35,079	19.8%
Supplemental Notice Mailing		
(+) Total Unique Postcards Re-mailed	12,167	6.9%
(-) Total Undeliverable (Re-Mailed) Postcards	1,771	0.2%
Email Notice to Undeliverable Mail		
(+) Total Unique Emails Sent	2,517	1.4%
(-) Total Undeliverable Emails	569	0.3%
Direct Notice Program Reach		
(+) Total Received Postcard Notice	152,321	85.8%
(+) Total Received Email Notice	1,948	1.1%
(=) Received Direct Notice	154,269	86.9%

VI. CLAIM ACTIVITY

18. ***Claim Intake and Processing.*** The online claim submission feature was available beginning December 19, 2022. As of February 23, 2023, P&N has received a total of 3,648 claims. Of these, P&N has determined that 3,555 claims (2.0% of the Settlement Class Members) are from Settlement Class Members and are non-duplicative claims. P&N will continue to intake and analyze claims through the claims filing deadline of March 20, 2023.

VII. EXCLUSIONS AND OBJECTIONS

19. ***Exclusions (Opt-Outs) Received.*** The deadline to submit a request for exclusion expired on February 17, 2023. P&N received zero (0) exclusion requests from Settlement Class Members.

20. **Settlement Objections.** The deadline to object to the Settlement expired on February 17, 2023. P&N received zero (0) objections from Settlement Class Members.

VIII. CERTIFICATION

I, Ryan Aldridge, declare under the penalty of perjury under the laws of the District of Columbia that the foregoing is true and correct. Executed on this 23rd day of February 2023 at Baton Rouge, Louisiana.

A handwritten signature in black ink that reads "Ryan Aldridge". The signature is written in a cursive style with a large initial "R".

Ryan Aldridge

Exhibit A



November 28, 2022

By Certified Mail

Federal and State Officials
as listed in Attachment 1

**Re: NOTICE UNDER THE CLASS ACTION FAIRNESS ACT OF 2005, 28 U.S.C. § 1715(b),
*Sanders et al. v. Ibex Global Solutions, Inc. et al., Case No. 1:22-cv-00591-TNM (District of Columbia)***

Dear Sir or Madam:

I send this letter and the enclosed disc to you on behalf of the Parties to the action referenced above (the “Parties”) regarding the Motion for Preliminary Approval of a Proposed Settlement filed on October 24, 2022. This communication constitutes the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) (“CAFA”).

The proposed settlement resolves the class action lawsuit brought by Monique Sanders, Darla Soich, and Christopher Harrison (“Representative Plaintiffs”) against Ibex Global Solutions, Inc. and Ibex Limited, (“Ibex” or “Defendant”) relating to a data security incident that occurred between July 27, 2020 and August 17, 2020 (the “Data Incident”). On or about March 4, 2022, Representative Plaintiffs filed their complaint for a putative class action against Ibex.

The complaint (“Complaint”) asserts five causes of action, all of which allegedly arise from the Data Incident: (1) negligence; (2) breach of implied contract; (3) unjust enrichment; (4) violation of the District of Columbia’s Unfair or Deceptive Trade Practices Act, D.C. Code § 28-3904, et seq; and (5) injunctive and declaratory relief. Representative Plaintiffs seek to represent a putative class defined as “all individuals in the United States and its Territories who received a notification letter stating that their PII may have been compromised during the Data Security Incident.” Ibex denies they are liable for the claims made in the lawsuit and deny any allegations of wrongdoing.

In accordance with 28 U.S.C. § 1715(b), the enclosed disc includes:

- a. Exhibit 1: A copy of the Class Action Complaint filed on March 4, 2022;
- b. Exhibit 2: A copy of the Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement filed on October 24, 2022;
- c. Exhibit 3: The Settlement Agreement filed with the Court on October 24, 2022, including the Class Notice Documents as Exhibits 1-4;
- d. Exhibit 4: A copy of the Order Granting Preliminary Approval of Class Action Settlement filed on November 18, 2022;
- e. Exhibit 5: Per 28 U.S.C. §§ 1715(b)(7)(A)-(B), the names of potential class members by state. Settlement Class Members may submit a claim for up to \$5,000 per claim for Out-of-Pocket Reimbursements, Lost Time, and Cash Payments for Identity Theft or Data Misuse. Settlement Class Members may also make a claim for 5 years of credit monitoring and identity protection services.



8550 United Plaza Blvd., Ste. 1001 – Baton Rouge, LA 70809
225-922-4600 Phone – 225-922-4611 Fax – pncpa.com

The Honorable Trevor N. McFadden of the United States District Court for the District of Columbia granted Plaintiff's Unopposed Motion for Preliminary Approval on November 18, 2022. A Final Approval Hearing is scheduled to be held on March 10, 2023, at 10:00 AM, in the United States District Court for the District of Columbia, 333 Constitution Avenue N.W., Courtroom 2, Washington D.C., 20001.

There are no other agreements between Class Counsel and counsel for Defendant, there are no final judgments in this matter, and there are no written judicial opinions relating to the materials described under 28 U.S.C. §§ 1715(b)(3)-(6).

Thank you for your attention to this matter. If you have any question about this notice or the enclosed materials, please contact us.

Sincerely,

A handwritten signature in black ink that reads 'Ryan Aldridge'.

Ryan Aldridge
Postlethwaite & Netterville as *Settlement Administrator*
Sanders et al. v. Ibex Global Solutions, Inc. et al.

cc by email:

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Plaintiff and the Plaintiff Class(es)*

CAFA Notice Service List							
Sanders et al. v. Ibex Global Solutions, Inc. et al., Case No. 1:22-cv-00591-TNM							
Name1	Name2	Address1	Address2	Address3	City	State	Zip
Office of the Attorney General		1031 W. 4th Avenue, Suite 200			Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200			Little Rock	AR	72201-2610
Office of the Attorney General		PO Box 7			Pago Pago	AS	96799
Office of the Attorney General		2005 N Central Ave			Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000			San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue			Hartford	CT	06106
Office of the Attorney General		441 4th Street NW, Suite 11005			Washington	DC	20001
United States Office of the Attorney General	US Department of Justice	950 Pennsylvania Ave, NW			Washington	DC	20530-0001
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	19801
Office of the Attorney General		The Capitol	PL-01		Tallahassee	FL	32399-1050
Office of the Attorney General		40 Capitol Square SW			Atlanta	GA	30334
Office of the Attorney General	Administrative Division	590 S. Marine Corps Dr., Suite 901			Tamuning	GU	96913
Department of the Attorney General		425 Queen Street			Honolulu	HI	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines	IA	50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise	ID	83720-0010
Office of the Attorney General		100 West Randolph Street			Chicago	IL	60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor			Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY	40601-3449
Office of the Attorney General		PO Box 94005			Baton Rouge	LA	70804
Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Boston	MA	02108
Office of the Attorney General		200 St. Paul Place			Baltimore	MD	21202
Office of the Attorney General		6 State House Station			Augusta	ME	04333
Office of the Attorney General		G. Mennen Williams Building	525 West Ottawa Street	PO Box 30212	Lansing	MI	48909
Office of the Attorney General		445 Minnesota Street, Suite 1400			St Paul	MN	55101-2131
Office of the Attorney General		Supreme Court Building	207 West High Street		Jefferson City	MO	65102
Office of the Attorney General		Administrative Building	PO Box 10007		Saipan	MP	96950
Office of the Attorney General		Walter Sillers Building	550 High Street, Suite 11		Jackson	MS	39201
Office of the Attorney General		Justice Building Third Floor	215 North Sanders		Helena	MT	59601
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street			Raleigh	NC	27603
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	58505
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General		RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton	NJ	08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300			Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	OH	43215
Office of the Attorney General		313 NE 21st Street			Oklahoma City	OK	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	PR	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	RI	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre	SD	57501-8501
Office of the Attorney General and Reporter		PO Box 20207			Nashville	TN	37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin	TX	78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		34-38 Kronprindsens Gade	Gers Building, 2nd Floor		St Thomas	VI	00802
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002

Exhibit B

To submit a claim for Credit Monitoring and Identity Theft Protection or Reimbursement of Time Spent Responding to the Data Security Incident, please complete the **below form**, sign, and mail this portion of the postcard to the Settlement Administrator **by no later than March 20, 2023**. Please complete the claim form for each category of benefits that you would like to claim. **You may claim one or both options.**

(*Note:* Claims for Reimbursement of Out-of-Pocket Expenses or Cash Payments for Identity Theft or Data Misuse require supporting documentation and, therefore, must be submitted online at www.IbexDataSettlement.com or mailed to the Settlement Administrator with a separate Claim Form.)

Contact Information (Please fill in completely.)

Name: _____ Telephone Number: _____

Address: _____

City, State, Zip Code: _____

Email Address: _____

Credit Monitoring and Identity Theft Protection

To receive the credit monitoring and identity theft protection plan offered as part of the settlement, please check the box below:

- I would like to claim five (5) years of credit monitoring and identity theft protection provided by Experian at no cost to me.

Reimbursement of Time Spent Responding to the Data Security Incident

To receive up to **\$125 in cash** for up to 5 hours of time responding to the Data Security Incident at a rate of \$25 per hour, provide the following:

I spent a total of hours of time in response to or addressing issues related to the Data Security Incident.

You **MUST** briefly describe how you spent your time responding to the Data Security Incident: _____

SIGN AND DATE YOUR CLAIM FORM

I declare under penalty of perjury that the information supplied in this claim form is true and correct to the best of my recollection. I authorize the Settlement Administrator to contact me, using the contact information set forth above, to obtain any necessary supplemental information.

Signature: _____ Date (mm/dd/yyyy): _____ Print Name: _____

The deadline to submit this form is **March 20, 2023**. Questions? Visit www.IbexDataSettlement.com or call 1-877-659-6287.



[CITY] [STATE] [ZIP]

[ADDRESS2]

[ADDRESS1]

[FIRST NAME] [LAST NAME]

MEMBER ID: [claim id]

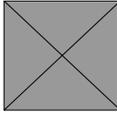


ELECTRONIC SERVICE REQUESTED

Baton Rouge, LA 70821

P.O. Box 1908

Ibex Settlement Administrator



Visit www.IbexDataSettlement.com or call 1-877-659-6287 for more information.

The Settlement is without an admission of liability. Information. The Settlement is without an admission of liability. A settlement has been reached in a class action lawsuit concerning a data security incident at Ibex Global Solutions, Inc. and Ibex Limited (collectively "Ibex" or "Defendant") that occurred in or around between July 27, 2020 and August 17, 2020 (the "Data Security Incident"). The Settlement would resolve a lawsuit in which Plaintiffs allege that the Data Security Incident potentially exposed individuals' personal identifying information ("PII"), including names, addresses, dates of birth, Social Security numbers, and medical information ("PII"), including names, addresses, dates of birth, Social Security numbers, and medical information.

action settlement.

If Ibex Global Solutions, Inc. notified you of a Data Security Incident in or around August 2021, you may be eligible for a CASH PAYMENT or other benefits under a class

Business Reply Mail Content

Postal Service: Do Not Mark or Cover Barcode

1-877-659-6287

www.IbexDataSettlement.com

Si necesita ayuda en español, comuníquese con el administrador al 1-877-659-6287

For more information, call toll-free 1-877-659-6287 or visit www.IbexDataSettlement.com and read the detailed Notice.

Fund and reimbursement of litigation expenses of no more than \$30,000 for the plaintiffs. You may attend the hearing, but you do not have to.

When will the Court decide whether to approve the Settlement? The Court will hold a hearing in this case on March 10, 2023 at the E. Barrett Prettyman Courthouse, 333 Constitution Avenue N.W., Washington D.C., 20001, Courtroom 2 to consider whether to approve the Settlement. The Court will also consider Class Counsel's request for attorneys' fees of up to 30% of the Settlement on behalf of the Class, and service awards of \$4,000 for the plaintiffs. You may attend the hearing, but you do not have to.

Notice explains how to submit a Claim Form, exclude yourself, or object.

If you do not want to be legally bound by the Settlement, you must exclude yourself by February 17, 2022, or you will not be able to sue the Defendant for released claims relating to the Data Security Incident. If you exclude yourself, you cannot get money or benefits from this Settlement. If you want to object to the Settlement, you may file an objection by February 17, 2022. The detailed

that a Claim Form be mailed to you. **Claims must be submitted online or postmarked by March 20, 2023.**

How do I receive a payment or other benefit? To receive any payments or benefits under the Settlement, you **MUST** submit a claim. To submit a claim, you may either: (i) fill out, detach, and mail the attached Postcard Claim Form to the Settlement Administrator; or (ii) submit a Claim Form online at www.IbexDataSettlement.com. You may also call 1-877-659-6287 to request

Visit the Settlement Website or call the toll-free number below for complete benefit details.

Further, the Settlement provides payments of \$100 for class members who experienced documented identity theft or data misuse. The Settlement also provides five (5) years of identity protection and credit monitoring for all class members who timely enroll. for: (i) up to \$125 in cash for a maximum of five (5) hours of lost time spent responding to the Data Security Incident at the rate

What are the Settlement benefits? The Settlement provides cash reimbursement payments to people who submit valid claims

Who is included in the Settlement? Ibex's records show you are a member of the Settlement Class. The Settlement Class includes all individuals who were sent a notification letter from Ibex stating that their PII may have been compromised during the Data Security Incident.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Sanders, et al. v. Ibox Global Solutions, Inc., et al., Case No. 1:22-cv-00591-TNM

If Ibox Global Solutions, Inc. notified you of a Data Security Incident in or around August 2021, you may be eligible for cash payments or other benefits from a class action settlement.

A court authorized this Notice. This is not a solicitation from a lawyer.

Si necesita ayuda en español, comuníquese con el administrador al 1-877-659-6287.

- A Settlement has been reached in a class action lawsuit against Ibox Global Solutions, Inc. and Ibox Limited (collectively, “Ibox” or “Defendants”) concerning a data security incident that occurred in or around between July 27, 2020 and August 17, 2020 (the “Data Security Incident”).
- The lawsuit is called *Sanders, et al. v. Ibox Global Solutions, Inc., et al.*, Case No. 1:22-cv-00591-TNM (the “Action”). The lawsuit alleges that the Data Security Incident potentially exposed certain personal identifying information (“PII”), including names, addresses, dates of birth, Social Security numbers, and medical information.
- The Settlement Class includes all individuals in the United States and its Territories who received a notification letter stating that their PII may have been compromised during the Data Security Incident. It excludes: (i) the judges presiding over the Action, and members of their direct families; and (ii) all class members who timely and validly request exclusion from the class.
- Your legal rights are affected regardless of whether you act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	This is the only way you may receive benefits from this Settlement. The deadline to submit a Claim Form is March 20, 2023 .
EXCLUDE YOURSELF FROM THE SETTLEMENT	You will receive no payment, but you will retain any rights you currently have with respect to Defendants and the issues in this case. The deadline to exclude yourself from the Settlement is February 17, 2023 .
OBJECT TO THE SETTLEMENT	Write to the Court explaining why you do not agree with the Settlement. The deadline to object is February 17, 2023 .
ATTEND THE FINAL APPROVAL HEARING	You or your attorney may attend and speak about your objection at the Final Approval Hearing. The Final Approval Hearing will be held on March 10, 2023 at 10:00 a.m.
DO NOTHING	You will not get any benefits from the Settlement, and you will give up certain legal rights. You will remain in the Class and be subject to the Release.

QUESTIONS? CALL 1-877-659-6287 TOLL-FREE OR VISIT WWW.IBEXDATASETTLEMENT.COM

- These rights and options, and the deadlines to exercise them, are explained in this Notice. For complete details, please see the Settlement Agreement, whose terms control, available at www.IbexDataSettlement.com.
- The Court in charge of this case still has to decide whether to approve the Settlement. No Settlement benefits or payments will be provided unless the Court approves the Settlement, and it becomes final.

BASIC INFORMATION

1. What is this Notice and why should I read it?

The Court authorized this Notice to inform you about a proposed Settlement with Ibex. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

Judge Trevor N. McFadden of the United States District Court for the District of Columbia is overseeing this class action. The case is called *Sanders, et al. v. Ibex Global Solutions, Inc., et al.*, Case No. 1:22-cv-00591-TNM.

2. What is a class action lawsuit?

A class action is a lawsuit in which one or more plaintiffs—in this case, Plaintiffs and Class Representatives Monique Sanders, Darla Soich, and Christopher Harrison—sue on behalf of a group of people who have similar claims. Together, this group is called a “Class” and consists of “Class Members.” In a class action, the court resolves the issues for all class members, except those who exclude themselves from the class.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

3. What is this lawsuit about?

Plaintiffs claim that Defendants failed to implement and maintain reasonable security measures to adequately protect the PII in its possession and to prevent the Data Security Incident from occurring.

Defendants deny that they are liable for the claims made in the lawsuit and deny any allegations of wrongdoing. More information about the complaint in the lawsuit can be found on the Settlement Website at www.IbexDataSettlement.com.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or Defendants should win this case. Instead, both sides agreed to this Settlement. That way, they can avoid the uncertainty, risks, and expense of ongoing litigation, and Settlement Class Members will be eligible to get compensation now rather than years later—if ever. The Class Representatives and attorneys for the Settlement Class

Members, called Class Counsel, agree the Settlement is in the best interests of the Settlement Class Members. The Settlement is not an admission of wrongdoing by the Defendants.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

You are part of the Settlement as a Settlement Class Member if you received a notification letter from Ibex stating that your PII may have been compromised during the Data Security Incident. PII may include names, addresses, dates of birth, Social Security numbers, and medical information.

Settlement Class Members will have been mailed notice of their eligibility. If you are still not sure whether you are included, you can contact the Settlement Administrator by calling 1-877-659-6287, by emailing info@IbexDataSettlement.com, or by visiting the website www.IbexDataSettlement.com.

This Settlement Class does not include (i) the judges presiding over the Action, and members of their direct families; and (ii) all class members who timely and validly request exclusion from the class.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Under the proposed Settlement, Ibex will pay (or cause to be paid) \$2,400,000.00 into a Settlement Fund. The Settlement Fund, plus interest accrued thereon, will pay notice and administration costs, Court-approved attorneys' fees and expenses, Court-approved service awards for class representatives, and certain Settlement Fund taxes and tax expenses (the "Net Settlement Fund"). The Net Settlement Fund will be used to provide eligible Settlement Class Members with payments and benefits described below.¹

Reimbursement for Lost Time and Out-of-Pocket Expenses: If you spent time responding to the Data Security Incident, you may be eligible to receive compensation for Lost Time. If you incurred financial losses that are fairly traceable to the Data Security Incident, you may be eligible to receive compensation for Out-of-Pocket Expenses.

- A. **Lost Time:** A claim for reimbursement may also include a claim for up to 5 hours of time spent in response to the Data Security Incident. Lost Time will be compensated at \$25.00/hour and requires a brief description of the action taken in response to the Data Security Incident and the time associated with those actions.

¹ If the benefits claimed by all Settlement Class Members meets or exceeds the amount of the Net Settlement Fund, then the payments and/or benefits for your Claim may be reduced *pro rata* by the Settlement Administrator so that the aggregate cost of all payments and benefits does not exceed the amount of the Net Settlement Fund.

B. Out-of-Pocket Expenses or Losses: A claim for reimbursement may include, but are not limited to the following provided the expenses were incurred primarily as a result of the Data Security Incident: (1) costs associated with purchasing credit monitoring or identity theft insurance; (2) costs associated with requesting a credit report; (3) costs associated with a credit freeze; (4) costs associated with cancelling a payment card and/or obtaining a replacement payment card; (5) costs associated with closing a bank account and/or opening a new bank account; (6) postage, long-distance phone charges, express mail and other incidental expenses, if you provide documentation of the charges and an explanation satisfactory to the Settlement Administrator of their relationship to the Data Security Incident; (7) unrefunded overdraft and/or overdraft protection fees; (8) unrefunded late and/or missed payment fees and/or charges; and (9) damage and costs associated with any stolen benefits or tax returns.

Identity Theft and Credit Monitoring: All Settlement Class Members are eligible to receive five (5) years of identity theft protection and credit monitoring, which includes identity theft monitoring, alerts, three bureau credit monitoring, fraud resolution, and up to \$1 million identity theft insurance coverage for certain costs, identity restoration, and unauthorized electronic fund transfers.

Cash Payments for Identity Theft or Data Misuse: Settlement Class Members who experienced actual or attempted identity theft or data misuse are eligible to receive a cash payment of One Hundred Dollars and Zero Cents (\$100.00). To receive this payment, Settlement Class Members must submit a valid Claim Form that includes documentation demonstrating that the Settlement Class Member: (i) experienced actual or attempted identity theft; or (ii) experienced other verifiable misuse, including receiving fraud alerts or alerts of information being on the dark web.

The maximum claim for Lost Time, Out-of-Pocket Losses and Cash Payment for Identity Theft or Data Misuse is \$5,000.00.

Confirmatory Discovery: Defendants have also agreed to provide documents and information to Class Counsel showing that Ibex has taken data security measures to remedy the issues that led to the Data Security Incident and has implemented other business practices to help ensure information security. For complete details, please see the Settlement Agreement, whose terms control, available at www.IbexDataSettlement.com.

HOW TO GET BENEFITS

7. How do I make a Claim?

To qualify for a Settlement benefit, you must complete and submit a Claim Form.

Settlement Class Members who want to submit a Claim must fill out and submit a Claim Form online at www.IbexDataSettlement.com or by mail to the Settlement Administrator. Claim Forms are available through the Settlement website at www.IbexDataSettlement.com or by calling 1-877-659-6287.

All Claim Forms must be submitted no later than March 20, 2023.

8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled for **March 10, 2023 at 10:00 a.m.** If the Court approves the Settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will be sent payment after all appeals and other reviews, if any, are completed. Please be patient.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes, the Court has appointed Federman & Sherwood and Murphy Law Firm as “Class Counsel” to represent you and all class members. You will not be charged for these lawyers. You can ask your own lawyer to appear in Court for you at your own expense if you want someone other than Class Counsel to represent you.

10. How will the lawyers be paid?

To date, Class Counsel has not received any payment for their services in conducting this litigation on behalf of the Class and have not been paid for their out-of-pocket expenses. Class Counsel will ask the Court for an award of attorneys’ fees not to exceed 30% of the Settlement Fund and for the reimbursement of litigation costs and expenses not to exceed \$30,000, which were incurred in connection with the Action. Such sums as may be approved by the Court will be paid from the Settlement Fund.

Class Counsel will also request a service award of Four Thousand Dollars and Zero Cents (\$4,000.00) for each of the Plaintiffs.

The Court will determine the proper amount of any attorneys’ fees, costs, and expenses to award Class Counsel and the proper amount of any service awards to Plaintiffs.

Class Counsel will file their request for attorneys’ fees, costs, and expenses and Service Awards for Plaintiffs with the Court, which will also be posted on the Settlement Website, at www.IbexDataSettlement.com.

YOUR RIGHTS AND OPTIONS

11. What claims do I give up by participating in this Settlement?

If you do not exclude yourself from the Settlement, you will not be able to sue Defendants about the Data Security Incident, and you will be bound by all decisions made by the Court in this case, the Settlement, and its included Release. This is true regardless of whether you submit a Claim Form. However, you may exclude yourself from the Settlement (*see FAQ #14*). If you exclude yourself from the Settlement, you will not be bound by any of the Released Claims, which are described in the Settlement Agreement at www.IbexDataSettlement.com.

12. What happens if I do nothing at all?

If you do nothing, you will receive no payments or benefits under the Settlement. You will be in the Settlement Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court, the Settlement, and its included Release. You will be deemed to have participated in the Settlement and will be subject to the provisions of Section 11 above. Unless you exclude yourself, you won't be able to file a lawsuit or be part of any other lawsuit against Defendants for the claims or legal issues released in this Settlement.

13. What happens if I ask to be excluded?

If you exclude yourself from the Settlement, you will receive no payments or benefits under the Settlement. However, you will not be in the Settlement Class and will not be legally bound by the Court's judgments related to the Settlement Class and Defendants in this class action.

14. How do I ask to be excluded?

You can ask to be excluded from the Settlement. To do so, you must send a letter to the Settlement Administrator stating that you want to be excluded from the Settlement in *Sanders, et al. v. Ibex Global Solutions, Inc., et al.*, Case No. 1:22-cv-00591-TNM. Your letter must include (1) your full name and current address; (2) a statement that you wish to be excluded from the Settlement Class; and (3) your signature. You must mail your exclusion request, postmarked no later than **February 17, 2023**, to the following address:

Ibex Data Security Settlement Administrator
c/o Postlethwaite & Netterville
PO Box 1908
Baton Rouge, LA 70821

You cannot exclude yourself by phone or email. Any individual who wants to be excluded from the Settlement must submit his or her own exclusion request. No group opt-outs shall be permitted.

15. If I don't exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendants for the claims or legal issues released in this Settlement, even if you do nothing.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, do not submit a Claim Form for payment or benefits.

17. How do I object to the Settlement?

If you do not exclude yourself from the Settlement Class, you can object to the Settlement if you do not agree with any part of it. You can give reasons why you think the Court should deny

approval by filing an objection. To object, you must file a written notice with the Court stating that you object to the Settlement in *Sanders, et al. v. Ibex Global Solutions, Inc., et al.*, Case No. 1:22-cv-00591-TNM. Your objection must be filed no later than **February 17, 2023**.

The objection must be in writing and be personally signed by you. The objection must include: (i) the name of this case; (ii) your full name, current mailing address, and telephone number; (iii) a statement of your position(s), including the grounds for the objection; (iv) a statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class; (v) copies of any documents supporting the objection; (vi) the identity of any attorneys representing the objector; (vii) a statement regarding whether you (or your attorney) intends to appear at the Final Approval Hearing; (viii) a list of all other matters in which you and/or your attorney has lodged an objection to a class action settlement; and (ix) your signature or the signature of your attorney.

In addition to filing your objection with the Court, you must also mail copies of your objection and any supporting documents to both Class Counsel and Defendants' lawyers at the addresses listed below, postmarked no later than **February 17, 2023**:

Class Counsel	Defendants' Counsel
<p>William B. Federman Federman & Sherwood 10205 N. Pennsylvania Ave. Oklahoma City, OK 73120</p> <p>A. Brooke Murphy Murphy Law Firm 4116 Will Rogers Pkwy, Suite 700 Oklahoma City, OK 73108</p>	<p>Brian E. Middlebrook John T. Mills Joseph L. Meadows Gordon Rees Scully Mansukhani, LLP One Battery Park Plaza, 28th Floor New York, New York 10004</p>

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

19. When and where will the Court hold a hearing on the fairness of the Settlement?

The Court will hold the Final Approval Hearing on **March 10, 2023 at 10:00 a.m.**, at the Elijah Barrett Prettyman Courthouse, 333 Constitution Avenue N.W., Washington D.C., 20001, Courtroom 2. The purpose of the hearing is for the Court to determine whether the Settlement is

fair, reasonable, adequate, and in the best interests of the Settlement Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees, costs, and expenses and the service awards to Plaintiffs.

The location, date and time of the Final Approval Hearing are subject to change by Court order. Any changes will be posted at the Settlement Website, www.IbexDataSettlement.com, or through the Court's publicly available docket. You should check the Settlement Website to confirm the date and time have not been changed.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. If your written objection was filed or mailed on time and meets the other criteria described in the Settlement, the Court will consider it. However, you may appear on your behalf or pay a lawyer to attend on your behalf to assert your objection if you would like.

21. May I speak at the hearing?

Yes. If you do not exclude yourself from the Settlement Class, you (or your attorney) may appear and speak at the Final Approval Hearing concerning any part of the proposed Settlement.

GETTING MORE INFORMATION

22. Where can I get additional information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at www.IbexDataSettlement.com or by writing to Ibex Data Security Settlement Administrator c/o Postlethwaite & Netterville, PO Box 1908, Baton Rouge, LA 70821.

23. How do I get more information?

Go to www.IbexDataSettlement.com, call 1-877-659-6287, email info@IbexDataSettlement.com or write to Ibex Data Security Settlement Administrator c/o Postlethwaite & Netterville, PO Box 1908, Baton Rouge, LA 70821.

PLEASE DO NOT CALL THE COURT, THE CLERK OF THE COURT, THE JUDGE, OR THE DEFENDANTS WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.

Sanders, et al. v. Ibex Global Solutions, Inc., Case No. 1:22-cv-00591-TNM

CLAIM FORM

If Ibex Global Solutions, Inc. notified you of a Data Security Incident in or around August 2021, you may be entitled to benefits under a class action settlement using this claim form. This claim form may be filled out online at www.IbexDataSettlement.com or submitted by mail to: Ibex Data Security Settlement Administrator c/o Postlethwaite & Netterville, PO Box 1908, Baton Rouge, LA 70821.

Please complete the claim form for each category of benefits that you would like to claim. Categories include: (1) Credit Monitoring and Identity Theft Protection; (2) Reimbursement of Time Spent Responding to the Data Security Incident; (3) Out-of-Pocket Losses and Expense Reimbursement; and (4) Cash Payments for Identity Theft or Data Misuse. **You may claim more than one benefit, and you may claim all four benefits if applicable.** As noted below, please be sure to fill in the total amount you are claiming for each category and attach documentation where applicable.

NOTE: YOU MUST SIGN THE CLAIM FORM AT THE BOTTOM OF THIS FORM IN ORDER TO HAVE A VALID CLAIM.

If you wish to submit a claim for a settlement benefits, you need to provide the information requested below and submit online or postmark your claim form to the Settlement Administrator **by no later than March 20, 2023.**

(Please visit www.IbexDataSettlement.com or call 1-877-659-6287 for more information on your legal rights and options.)

Si necesita ayuda en español, comuníquese con el administrador al 1-877-659-6287.

Contact Information

Please fill in completely.

Settlement Member ID: _____

Name: _____

Address: _____

City, State, Zip Code: _____

Email Address: _____

Telephone Number: _____

Credit Monitoring and Identity Theft Protection

To receive the credit monitoring and identity theft protection plan offered as part of the settlement, please check the box below:

I would like to claim five (5) years of credit monitoring and identity theft protection provided by Experian at no cost to me.

Reimbursement of Time Spent Responding to the Data Security Incident

To receive up to **\$125 in cash** reimbursement for up to five (5) hours of time responding to the Data Security Incident at a rate of \$25.00 per hour, provide the following:

I spent a total of hours of time in response to or addressing issues related to the Data Security Incident.

You **MUST** briefly describe how you spent your time responding to the Data Security Incident: _____

Out-of-Pocket Loss and Expense Reimbursement

To receive up to \$5,000 in reimbursement of out-of-pocket losses caused by, or expenses incurred as a result of, the Data Security Incident, please provide the following information:

Amount Requested: \$ _____.

Please briefly describe the out-of-pocket expenses and how they relate to the Data Security Incident: _____

Documentary proof **MUST** be submitted to support your exact claim amount. “Self-prepared” documents are, by themselves, insufficient.

Cash Payments for Identity Theft or Data Misuse

If you experienced actual or attempted identity theft or data misuse following the Data Security Incident and would like to receive **\$100 in cash**, please provide the below information:

I declare that I experienced actual or attempted identity theft or data misuse following the Data Security Incident.

Please describe the actual or attempted identity theft or data misuse you experienced, including dates or approximate dates: _____

Documentary proof **MUST** be submitted to support your exact claim amount. “Self-prepared” documents are, by themselves, insufficient.

SIGN AND DATE YOUR CLAIM FORM

I declare under penalty of perjury under the laws of the United States and the laws of my State of residence that the information supplied in this claim form by the undersigned is true and correct to the best of my recollection. I understand that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid, and authorize the Settlement Administrator to contact me using the contact information set forth above to obtain any necessary supplemental information.

Signature: _____ Date (mm/dd/yyyy): _____ Print Name: _____

The deadline to postmark and mail this form is **March 20, 2023**

PLEASE KEEP A COPY OF YOUR CLAIM FORM AND PROOF OF SUBMISSION

Exhibit C

Notice of Settlement - Sanders v. Ibex Global Solutions Inc.

You May Be A Class Member Entitled To Compensation If Ibex Global Solutions, Inc., Notified You Of A Data Security Incident In Or Around August 2021

Settlement Administrator notice@pnclassaction.com

Reply-To: info@ibexdatasettlement.com

Your Member ID is: ABC-1234567

LEGAL NOTICE

Sanders, et al. v. Ibex Global Solutions Inc., Case No. 1:22-cv-00591-TNM

You May Be A Class Member Entitled To Compensation If Ibex Global Solutions, Inc., Notified You Of A Data Security Incident In Or Around August 2021

What Is This Lawsuit About?

A settlement has been reached in a class action lawsuit concerning a data security incident at Ibex Global Solutions, Inc. and Ibex Limited (collectively “Ibex” or “Defendant”) that occurred in or around between July 27, 2020, and August 17, 2020 (the “Data Security Incident”). The Settlement would resolve a lawsuit in which Plaintiffs allege that the Data Security Incident potentially exposed individuals’ personal identifying information (“PII”), including names, addresses, dates of birth, Social Security numbers, and medical information. The Settlement is without an admission of liability.

Who is Included in the Settlement?

Ibex’s records show you are a member of the Settlement Class. The Settlement Class includes all individuals who were sent a notification letter from Ibex stating that their PII may have been compromised during the Data Security Incident.

What are the Settlement benefits?

The Settlement provides cash reimbursement payments to people who submit valid claims for: (i) up to \$125 in cash for a maximum of five (5) hours of lost time spent responding to the Data Security Incident at the rate of \$25 per hour, and (ii) up to \$5,000 for documented out-of-pocket expenses or losses incurred due to the Data Security Incident. The Settlement also provides five (5) years of identity protection and credit monitoring for all class members who timely enroll. Further, the Settlement provides payments of \$100 for class members who experienced documented identity theft or data

misuse. Visit the Settlement Website at www.IbexDataSettlement.com or call [1-877-659-6287](tel:1-877-659-6287) for complete benefit details.

What Are My Other Rights and Options?

How do I receive a payment or other benefit? To receive any payments or benefits under the Settlement, you **MUST** submit a claim. To submit a claim, you may either: (i) fill out, detach, and mail the attached Postcard Claim Form to the Settlement Administrator; or (ii) submit a Claim Form online at www.IbexDataSettlement.com. You may also call [1-877-659-6287](tel:1-877-659-6287) to request that a Claim Form be mailed to you. **Claims must be submitted online or postmarked by March 20, 2023.**

If you do not want to be legally bound by the Settlement, you must exclude yourself by February 17, 2022, or you will not be able to sue the Defendant for released claims relating to the Data Security Incident. If you exclude yourself, you cannot get money or benefits from this Settlement. If you want to object to the Settlement, you may file an objection by February 17, 2022. The detailed Notice explains how to submit a Claim Form, exclude yourself, or object.

When will the Court decide whether to approve the Settlement?

The Court will hold a hearing in this case on March 10, 2023 at the E. Barrett Prettyman Courthouse, 333 Constitution Avenue N.W., Washington D.C., 20001, Courtroom 2 to consider whether to approve the Settlement. The Court will also consider Class Counsel's request for attorneys' fees of up to 30% of the Settlement Fund and reimbursement of litigation expenses of no more than \$30,000 for litigating the case and negotiating the Settlement on behalf of the Class, and service awards of \$4,000 for the plaintiffs. You may attend the hearing, but you do not have to. For more information, call toll-free [1-877-659-6287](tel:1-877-659-6287) or visit www.IbexDataSettlement.com and read the detailed Notice.

How Can I Get More Information?

This Notice summarizes the proposed settlement. You can get a copy of the settlement agreement, important Court documents, and more information about the settlement at www.IbexDataSettlement.com. You may contact the Class Administrator with questions at Info@IbexDataSettlement.com or call [1-877-659-6287](tel:1-877-659-6287).

Settlement Administrator
PO Box 1908, Baton Rouge, LA 70821
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