

If you were notified by Valley Mountain Regional Center, Inc. about an August 2023 Data Security Incident, a Class Action Settlement May Affect Your Rights.

Brett, et al. v. Valley Mountain Regional Center, Inc.
Superior Court of California, County of San Joaquin
Case No. STK-CV-UPI-2024-0005025

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

- A settlement has been proposed in a class action lawsuit against Defendant Valley Mountain Regional Center (“VMRC or Defendant”) relating to an August 2023 cyberattack during which cybercriminals potentially accessed files that contained individuals’ private information (the “Data Security Incident”). Defendant denies all claims alleged against it and denies all charges of wrongdoing or liability. The settlement is not an admission of wrongdoing or an indication that VMRC has violated any laws, but rather the resolution of disputed claims.
- You are a “Class Member” if you received a notification from Defendant about the August 2023 Data Security Incident.
- The Settlement provides for a \$2,200,000 settlement fund (the “Settlement Fund”) to be created for the benefit of Class Members. The Settlement Fund will pay for Attorneys’ Fees, Costs, and Expenses, any Service Awards, and the Settlement Administration Costs. Thereafter, the priority for payment of claimed benefits will be as follows: either (a) payment for documented losses up to \$5,000 or (b) **a Cash Payment in the amount of \$100**, subject to a pro rata adjustment.
- Your legal rights are affected regardless of whether you do or do not act. Read this notice carefully. For complete details, visit **www.VMRCDataSettlement.com** or call toll-free 1-888-678-2651.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights and Options		Deadline
DO NOTHING	If you do nothing, you will not receive any benefits from the Settlement. You will also give up certain legal rights.	
SUBMIT A CLAIM FORM	Submitting a valid Claim Form is the only way to receive a payment or other benefit. Claims must be submitted by August 15, 2025 .	August 15, 2025
EXCLUDE YOURSELF	If you exclude yourself from the Settlement, you will not receive a cash payment, but you also will also not release your claims against Defendant. This is the only option that allows you to be part of another lawsuit against Defendant for the legal claims that are being resolved by the Settlement. If you exclude yourself from the Settlement, you may not object to the Settlement.	August 15, 2025
OBJECT	To object to the settlement, you can write to the Court with reasons why you do not agree with the Settlement. You may ask the Court for permission for you or your attorney to speak about your objection at the Final Fairness Hearing at your own expense.	August 15, 2025

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case must still decide whether to approve the Settlement and the requested attorneys’ fees, service awards and costs. No Settlement benefits or payments will be provided unless and until the Court approves the Settlement and it becomes final.

Questions? Go to www.VMRCDataSettlement.com, call 1-888-678-2651, email VMRCDataSettlement@cptgroup.com, or write to *Brett et al. v. Valley Mountain Regional Center, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606

BASIC INFORMATION

1. Why is this Notice being provided?

A court directed that this Notice be provided because you have the right to know about the proposed Settlement that has been reached in this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, and after objections or appeals, if any, are resolved, the Claims Administrator appointed by the Court will distribute the Settlement Benefits to Settlement Class Members who submitted a Valid Claim. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get them.

The Honorable Robert T. Waters of the Superior Court of California, County of San Joaquin is overseeing this class action. The case is known as *Brett, et al. v. Valley Mountain Regional Center, Inc.*, Case No. STK-CV-UPI-2024-0005025 (the “Litigation”). The people who filed this lawsuit are called the “Plaintiffs” or “Class Representatives,” and the entity sued, Valley Mountain Regional Center, Inc. is called the “Defendant.”

2. What is this lawsuit about?

The Plaintiffs claim that Defendant is liable for the Data Security Incident and has asserted numerous legal claims. VMRC denies each and all of the claims and contentions alleged against it in the Action, and denies all charges of wrongdoing or liability as alleged, or which could be alleged, in the Litigation.

For more information and to review the complaints filed in this Litigation, visit www.VMRCDataSettlement.com.

3. Why is the lawsuit a class action?

In a class action, one or more people called Plaintiff or Plaintiffs sue on behalf of all people who have similar claims. Together, in the context of a settlement like this one, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely exclude themselves (opt-out) from the Settlement Class.

4. Why is there a Settlement?

The Court did not decide in Plaintiffs’ or Defendant’s favor. Instead, Plaintiffs and Defendant negotiated a settlement that allows Plaintiffs, the proposed Settlement Class, and Defendant to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. The Settlement provides benefits and allows Settlement Class Members to obtain payment for certain costs or losses without further delay. Plaintiffs and the attorneys for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members. This Settlement does not mean that VMRC did anything wrong.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

The Settlement Class includes all persons in the United States whose private information was compromised in the Data Security Incident disclosed by Defendant, in or around April 2023.

Settlement Class Members were also sent notice of this class action Settlement via mail. If you received notice of this Settlement, you are eligible to receive Settlement Benefits. If you are not sure whether you are a Settlement Class Member, you may contact the Settlement Administrator at 1-888-678-2651 or by emailing VMRCDataSettlement@cptgroup.com. Standard data, call and messaging rates apply.

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are Defendant's governing board members, governmental entities, the Judge presiding over the Litigation, members of the Judge's immediate family and Court staff and Class Members who submit a valid Request for Exclusion.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the settlement website at www.VMRCDataSettlement.com or call the Settlement Administrator's toll-free number at 1-888-678-2651, or email VMRCDataSettlement@cptgroup.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

The Settlement provides for a Settlement Fund of \$2,200,000 (the "Settlement Fund"). The Settlement Fund will be used to pay benefits to the Class Members who have identifiable and valid mailing addresses, the costs of notice and claims administration, attorneys' fees and costs, service awards to the Plaintiffs and other court approved costs and expenses reasonably contemplated by the settlement.

By submitting a valid and timely claim for the Cash Payment benefit using the Claim Form, you are eligible to receive a Cash Payment (prorated depending upon how many Settlement Class Members have valid Claims). All Class Members who submit a valid Claim are eligible to receive either (a) payment for documented losses up to \$5,000 or (b) a Cash Payment in the amount of \$100, subject to a *pro rata* adjustment based upon the total number of valid Claims.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. Do I need to submit a claim?

In order to receive a cash payment under the Settlement, you must complete and submit a Claim Form. If you do nothing, you will **not** be eligible to receive a payment. You will also give up certain legal rights.

10. How do I submit a claim for the cash payment?

To receive a Cash Payment you must submit a valid and timely Claim Form to the Settlement Administrator by **August 15, 2025**. You will need your name, address, telephone number, and email address, if applicable, and CPT ID provided in the Postcard Notice sent to you, to file a Claim Form.

Questions? Go to www.VMRCDataSettlement.com, call 1-888-678-2651, email VMRCDataSettlement@cptgroup.com, or write to *Brett et al. v. Valley Mountain Regional Center, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606

Claim forms can be submitted by mail or online at www.VMRCDataSettlement.com. If by mail, the Claim Form must be **postmarked** by **August 15, 2025**. You may request a Claim Form be mailed to you by calling 1-888-678-2651 or by writing to:

Brett et al. v. Valley Mountain Regional Center, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
VMRCDataSettlement@cptgroup.com

11. What am I giving up so as to receive the Cash Payment or to stay in the Settlement Class?

If the Settlement becomes final, you will give up your right to sue VMRC for the claims being resolved by this Settlement. The specific claims you are giving up against VMRC and the claims you are releasing are described in the Settlement Agreement, available at www.VMRCDataSettlement.com. The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions about what claims you are giving up and which parties you are releasing, you can talk to the law firms listed in Question 15 for free or you can, of course, talk to your own lawyer at your own expense.

12. What are the Released Claims?

The Settlement Agreement in Section XIII describes the Release, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.VMRCDataSettlement.com, or in the public Court records on file in this Lawsuit. You can also request a copy of the Settlement Agreement be mailed to you by calling or writing to the Settlement Administrator. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

13. What happens if my contact information changes after I submit a claim or receive the Postcard Notice?

If you change your mailing address or email address after you submit a claim form or after you received the Postcard Notice, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by calling 1-888-678-2651, by emailing VMRCDataSettlement@cptgroup.com, or by writing to:

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c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
1-888-678-2651
VMRCDataSettlement@cptgroup.com

14. When will I receive my Settlement Benefits?

If you received notice in the mail, or if you file a timely and valid claim form, payment will be provided by the Settlement Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check www.VMRCDataSettlement.com or call the Settlement Administrator or the attorneys in Question 15, below, for updates.

Questions? Go to www.VMRCDataSettlement.com, call 1-888-678-2651, email VMRCDataSettlement@cptgroup.com, or write to *Brett et al. v. Valley Mountain Regional Center, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed Scott Edward Cole of Cole & Van Note, 555 12th Street, Ste. 2100, Oakland, CA 94607, Jason Wucetich of Wucetich & Korovilas LLP, 222 N. Pacific Coast Hwy., Suite 2000, El Segundo, CA 90245 and John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC 402 W. Broadway, Suite 1760, San Diego, CA 92101 as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You will not be charged for contacting Class Counsel. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in the Litigation.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees of up to 33.33% of the Settlement plus reasonable costs of the Litigation to Class Counsel. They will also ask the Court to approve service awards of \$2,500 to Plaintiffs for their service to the Litigation and for their efforts in achieving the Settlement. If awarded by the Court, attorneys' fees and costs and the service awards will be paid out of the Settlement Fund. The Court may award less than these amounts.

A copy of Class Counsel's application for attorneys' fees, costs, and service awards will be made available on the settlement website at www.VMRCDataSettlement.com before the deadline for submission of objections. You may also request a copy be mailed to you by calling the Settlement Administrator.

OPTING OUT OF THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue Defendant on your own based on the claims raised in the Litigation or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from or "opting-out" of the Settlement.

17. How do I get out of the Settlement?

To opt-out of the Settlement, you must mail a written notice of intent to opt-out, also referred to as a "Request for Exclusion" in the Settlement Agreement. The written notice must be signed by you, include your name, mailing address, telephone number, email address (if any) and clearly state that you wish to be excluded from the Settlement.

The opt-out request must be **postmarked by the United States Postal Service** and sent to the Settlement Administrator at the following address by **August 15, 2025**:

Brett et al. v. Valley Mountain Regional Center, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

You cannot exclude yourself by telephone.

18. If I opt out, can I get anything from the Settlement?

No. If you opt out, you are telling the Court you do not want to be part of the Settlement. You can only get Settlement benefits if you stay in the Settlement. If you opt out, do not submit a claim form.

Questions? Go to www.VMRCDataSettlement.com, call 1-888-678-2651, email VMRCDataSettlement@cptgroup.com, or write to *Brett et al. v. Valley Mountain Regional Center, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606

19. If I do not opt out, can I sue the Defendant for the same thing later?

No. Unless you opt-out, you give up any right to sue Defendant and Released Parties for the claims this Settlement resolves and releases relating to the Data Security Incident. You must opt-out of the Litigation to start your own lawsuit against the Defendant or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

20. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can tell the Court you do not agree with the Settlement or some part of it. You can also give reasons why you think the Court should not approve the Settlement. To object, you must mail timely written notice to the Settlement Administrator as provided below no later than **August 15, 2025**, stating you object to the Settlement. The objection must include all the following additional information:

- 1) Your full name, current address, current telephone number, and any email address;
- 2) The case name and number — *Brett, et al. v. Valley Mountain Regional Center, Inc.* Case No. STK-CV-UPI-2024-0005025 (Superior Court of California, County of San Joaquin).
- 3) Information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class (e.g., copy of your Postcard Notice, copy of the original notice of the Incident, or a statement explaining why you believe you are a Settlement Class Member);
- 4) A written statement of the position you wish to assert, including the legal and factual grounds for the position;
- 5) Copies of any other documents you wish to submit in support of your position;
- 6) The identity of any and all counsel representing you in connection with the objection;
- 7) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any)
- 8) A statement whether you or your counsel request to appear at the Final Approval Hearing; and
- 9) Your signature

To be timely, written notice of an objection in the appropriate form must be mailed, postmarked by the United States Postal Service no later than **August 15, 2025** to the Settlement Administrator at the following address:

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c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

Any Settlement Class Member who fails to comply with the requirements for objecting shall waive and forfeit any and all rights he or she may have to appear separately and/or to object to the Settlement Agreement and shall be bound by all the terms of the Settlement Agreement and by all proceedings, orders and judgments in the Action. The exclusive means for any challenge to the Settlement Agreement shall be through the provisions set forth herein.

Questions? Go to www.VMRCDataSettlement.com, call 1-888-678-2651, email VMRCDataSettlement@cptgroup.com, or write to *Brett et al. v. Valley Mountain Regional Center, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606

21. What is the difference between objecting and asking to opt out?

Objecting is simply telling the Court you do not like something about the Settlement. If you exclude yourself from the Settlement, you have no basis to object or submit a Claim Form because the Settlement no longer affects you.

THE FINAL APPROVAL HEARING

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **August 28 2025 at 9:00 a.m.** before Judge Robert T. Waters at the Superior Court of California, County of San Joaquin, Courtroom 11B.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's application for attorneys' fees, costs and expenses, and the service awards to Plaintiffs. If there are objections, the Court will consider them. The Court may also listen to people who have asked to speak at the hearing. You may attend the hearing at your own expense, or you may pay your own lawyer to attend, but it is not necessary.

Note: The date and time of the Final Approval Hearing are subject to change. Any change will be posted at www.VMRCDataSettlement.com.

23. Do I have to attend to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to speak about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

24. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must follow the instructions provided in Question 20 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive any Settlement benefits. If the Court approves the Settlement, and you do nothing, you will be bound by the Settlement Agreement. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against VMRC or Released Persons about the issues involved in this lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.VMRCDataSettlement.com, by calling 1-888-678-2651 or by writing to:

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c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
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**PLEASE DO NOT TELEPHONE THE COURT
REGARDING THIS NOTICE.
CONTACT CPT GROUP, 1-888-678-2651**