

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Mikolaitis v. Ward Transport & Logistics Corp., Case No. 2:24-cv-01565 (USDC, W.D. PA)

A Court Authorized this Detailed Notice (“Notice”).

This is not spam, an advertisement, or a lawyer solicitation.

Si desea recibir esta notificación en español, llámenos o visite nuestra página web.

If You Are an Individual Whose Personal Information May Have Been Compromised as a Result of the Incident and Received a Notification Letter Related to the Incident as identified on the Class List, You Are Eligible to Receive a Settlement Benefit from the Settlement

A Court authorized this Notice to those that are eligible to receive settlement benefits from a proposed class action settlement. The action is *Mikolaitis v. Ward Transport & Logistics Corp.*, Case No. 2:24-cv-01565 and is pending in the United States District Court for the Western District of Pennsylvania. The people that filed the class action lawsuit are called Plaintiffs or Class Representatives and the company they sued is Ward Transport & Logistics Corp. (or Defendant). Defendant denies any wrongdoing whatsoever.

- **Who is a Class Member?**

All individuals within the United States of America whose PII and/or financial information was exposed to unauthorized third-parties as a result of the data breach experienced by Defendant including all who received a Notice of the Data Breach.

The Settlement Class will exclude: the Judge assigned to evaluate the fairness of this Agreement, and any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Incident or who pleads *nolo contendere* to any such charge. Also, excluded are Class Members who timely and validly opt-out of the settlement.

Class Members under the Settlement Agreement will be eligible to receive one or more of the following:

- **Cash Payment “A”: Compensation for Ordinary Losses** – Class Members who submit a valid claim, *including necessary supporting documentation*, are eligible for Ordinary Out-of-Pocket Losses, up to \$5,000 per Class Member that are fairly traceable to the Data Incident;
- **Credit Monitoring** – Class Members who make a valid claim for Identity Theft Protection Services of credit monitoring for two (2) years, to include identity theft insurance of no less than \$1,000,000;
- **Cash Payment “B”: Credit Monitoring Equivalent** – Class Members will receive a *pro rata* cash payment of up to \$100 from the fund remaining in the Net Settlement Amount after payment of credit monitoring and compensation for Ordinary Losses.

To obtain more information, visit **www.WTLDataSettlement.com** or call **(844) 918-7626**.

Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

Summary of Your Legal Rights		Deadline(s)
Submit a Claim Form	The only way to receive a settlement benefit from the settlement.	Submitted or postmarked on or before APRIL 27, 2026
Exclude Yourself by Opting Out of the Settlement Class	Receive no benefit from the settlement. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant relating to the Data Incident.	Mailed and postmarked on or before FEBRUARY 9, 2026
Object to the Settlement and/or Attend the Final Approval Hearing	You can write the Court about why you agree or disagree with the settlement or the Attorneys' Fees Amount and Service Awards. The Court cannot order a different settlement. You can also ask to speak at the Final Approval Hearing on April 27, 2026, about the fairness of the settlement, with or without your own attorney.	Mailed and postmarked on or before FEBRUARY 9, 2026
Do Nothing	You will not receive any settlement benefit from this class action settlement, but will remain a Class Member and be bound by the releases.	N/A

- Your rights and options as a Settlement Class Member – **and the deadlines to exercise your rights** – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Payments to Settlement Class Members will be made if the Court approves the Settlement and after any possible appeals are resolved.

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BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the settlement, and all of your options, before the Court decides whether to give final approval to the settlement. This Notice explains the nature of the action that is the subject of the settlement, the general terms of the settlement, and your legal rights and options.

The Honorable Christy Criswell Wiegand of the United States District Court for the Western District of Pennsylvania is overseeing this case captioned as *Mikolaitis v. Ward Transport & Logistics Corp.*, Case No. 2:24-cv-01565. The people who brought the lawsuit are called the Class Representatives. The company being sued, Ward Transport & Logistics Corp., is called the Defendant.

2. What is the Action about?

This Action alleges that during a Data Breach that started on approximately March 3, 2024, a well-known ransomware group accessed Ward's information network and stole a massive 574 gigabytes of data. Plaintiff filed this action on October 15, 2024, alleging that Plaintiff's and Class members' highly sensitive personal information ("PII") was exposed on the dark web and that Ward was negligent with regard to its data security practices in permitting an unauthorized third party to access its network and exfiltrate the PII. Defendant denies all claims asserted against it in the Action, all allegations of wrongdoing and liability, and all material allegations in the Complaint filed in the Action but has agreed to settle all claims. No court or other judicial body has made any judgment or other determination that Defendant has done anything wrong.

3. Why is this a class action?

In a class action, one or more people called "Class Representatives" or "Plaintiffs" sue on behalf of all people who have similar claims. Together, all of these people are called a "Settlement Class," and the individuals are called "Class Members." One court resolves the issues for all Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. Instead, both sides agreed to the settlement. The settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Class Members. The Class Representatives appointed to represent the Settlement Class, and the attorneys for the Settlement Class, Class Counsel, think the settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT?

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

You are affected by the settlement and potentially a Class Member if you are an individual whose personal information may have been compromised because of the Data Breach Incident and received a notification letter from Ward related to the incident, as identified on the Class List.

The Settlement Class will exclude: the Judge assigned to evaluate the fairness of this Agreement, and any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Data Incident or who pleads *nolo contendere* to any such charge. Also, excluded are Class Member who timely and validly opt-out of the settlement.

6. What if I am not sure whether I am included in the settlement?

If you are not sure whether you are included in the settlement, you may call (844) 918-7626 with questions. You may also write with questions to:

Ward Transport & Logistics Data Settlement
c/o Analytics Consulting LLC
PO Box 2007
Chanhassen, MN 55317-2007

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the settlement provide?

The settlement provides the following settlement benefits available to Class Members who submit valid claims: (a) Identity Theft Protection Services for credit monitoring for two (2) years, to include identity theft insurance of no less than \$1,000,000; (b) Out-of-Pocket Losses up to \$5,000 per claimant; and (c) Cash Payment for a *pro rata* share of the Net Settlement Fund, up to \$100.

8. What settlement benefits are available under the settlement?

Class Members that submit a valid and timely Claim Form may select one or more of the following Settlement benefits:

- **Cash Payment “A”: Compensation for Out-of-Pocket Losses** – Class Members who submit a valid claim, including necessary supporting documentation, are eligible for the following Out-of-Pocket Losses, up to \$5,000 per Class Member that are fairly traceable to the Data Incident;
- **Credit Monitoring** – Class Members who make a valid claim for Identity Theft Protection Services of credit monitoring for two (2) years, to include identity theft insurance of no less than \$1,000,000;
- **Cash Payment “B”: Credit Monitoring Equivalent** – Class Members will receive a *pro rata* cash payment of up to \$100 from the fund remaining in the Net Settlement Amount after payment of credit monitoring and compensation for Ordinary Losses.

All Claimants will receive Credit Monitoring unless they elect to receive Cash Payment “B”. Credit Monitoring will be arranged by the Settlement Administrator and paid for out of the Net Settlement Fund prior to calculation and issuance of any Cash Payments. In the event that Valid Claims for Cash Payments “A”, “B”, and the cost of Credit Monitoring exceed the Net Settlement Fund, any approved Claims for Cash Payment “A” or “B” will be reduced *pro rata* on the same basis so that the Net Settlement Fund is sufficient to cover the payment of all such Claims.

HOW DO YOU SUBMIT A CLAIM?

9. How do I get a settlement benefit?

To receive a settlement benefit, you must complete and submit a Claim Form online at www.WTLDataSettlement.com or by mail to Ward Transport & Logistics Data Settlement, c/o Analytics Consulting LLC, PO Box 2007, Chanhassen, MN 55317-2007. Read the Claim Form instructions carefully, fill out the Claim Form, provide the required documentation, and submit online by **APRIL 27, 2026**, or by mail **postmarked by APRIL 27, 2026**.

10. When will I get my settlement benefit?

The Court will hold a Final Approval Hearing on **April 27, 2026, at 10:00 a.m. (E.T.)** to decide whether to approve the settlement. If the Court approves the settlement, there may be appeals from that decision and resolving them can

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take time. It also takes time for all of the Claim Forms to be processed. Please be patient. Settlement payments and Identity Theft Protection Services will begin after the settlement has obtained Court approval and the time for all appeals has expired.

11. What am I giving up as part of the settlement?

Defendant and its affiliates will receive a release from all claims that could have been or that were brought against Defendant relating to the Data Incident. Thus, if the settlement becomes final and you do not exclude yourself from the settlement, you will be a Class Member and you will give up your right to sue Defendant, and all of their respective past, present, and future employees, officers, directors, affiliates, agents, vendors, attorneys, insurers, successors, parent companies, subsidiaries, and shareholders (the “Releasees”), and any other person acting on Defendant’ behalf, in its capacity as such and assigns of each of them as well as covered entities associated with the Data Incident. These releases are described in Section 5 of the Settlement Agreement, which is available at www.WTLDataSettlement.com. If you have any questions, you can talk to the law firms listed in Question 17 for free, or you can talk to your own lawyer.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of the settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as “opting out” of the Settlement Class.

12. If I exclude myself, can I get a settlement benefit from this settlement?

No. If you exclude yourself, you will not be entitled to receive any benefits from the settlement.

13. If I do not exclude myself, can I sue the Releasees for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant and any other Releasees for any claim that could have been or was brought relating to the Data Incident. You must exclude yourself from the Settlement to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

14. How do I exclude myself from the Settlement?

To exclude yourself, send a request to opt-out or written notice of intent to opt-out that says you want to be excluded from the settlement. Any person who submits a valid and timely request to opt-out will be excluded from the settlement, will not receive the benefits of the settlement, and will not be bound by any of its terms, including the Releases detailed in the Settlement Agreement. Any Class Member who does not submit a valid and timely opt-out will be bound by the settlement. You must mail your request to opt-out to the Settlement Administrator **postmarked by FEBRUARY 9, 2026**, to:

Ward Transport & Logistics Data Settlement
c/o Analytics Consulting LLC
PO Box 2007
Chanhassen, MN 55317-2007

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court that I do not like the settlement?

You can tell the Court that you do not agree with the settlement, and/or the Attorneys’ Fees Amount and Service Awards or some part of it by objecting to the settlement. Objections must be filed with the Clerk of the Court and

copies served on Class Counsel and Defendant’s Counsel at the addresses listed below, **postmarked by no later than FEBRUARY 9, 2026.**

Clerk of the Court	Class Counsel	Defendant’s Counsel
Joseph F. Weis, Jr. U.S. Courthouse 700 Grant Street Pittsburgh, PA 15219	Marc Edelson Edelson Lechtzin LLP 411 S. State Street, Suite N-300 Newtown, PA 18940 Phone: (215) 867-2399 medelson@edelson-law.com Gary F. Lynch Lynch Carpenter, LLP 1133 Penn Avenue, 5th Floor Pittsburgh, PA 15222 Phone: (412) 322-9243 gary@lcllp.com	Joseph A. McNelis, III Constangy, Brooks, Smith & Prophete, LLP 1650 Market Street, Suite 3600 Philadelphia, PA 19103 Phone: (267) 996-8231 jmcnelis@constangy.com

For an objection to be considered by the Court, the objection must include all of the following:

1. the case name and number of the Action;
2. the objector’s full name, address, email address, and telephone number;
3. all grounds for the objection, accompanied by any legal support for the objection;
4. the identity of any counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement, the fee application, or the application for Service Award;
5. the identity of all counsel (if any) representing the objector who will appear at the Fairness Hearing;
6. a list of any persons who will be called to testify at the Fairness Hearing in support of the objection;
7. a statement confirming whether the objector intends to personally appear and/or testify at the Fairness Hearing; and
8. the objector’s original signature on the written objection (an attorney’s signature is not sufficient).

16. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the settlement or parts of it and why you do not think it should be approved. You can object only if you are a Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any benefit from the settlement.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed Marc H. Edelson of Edelson Lechtzin LLP and Gary F. Lynch of Lynch Carpenter, LLP, as Class Counsel to represent the Settlement Class in settlement negotiations. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will the Class Counsel be paid?

Class Counsel shall file a motion with the Court for consideration at the Final Approval Hearing seeking to be paid attorneys’ fees of up to the Attorneys’ Fees Amount of one-third of the Settlement Payment (\$116,666.67), to be paid

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from the Settlement Fund, plus expenses, plus a Service Award of up to \$3,500 for the Class Representative, to be paid from the Settlement Fund.

Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Any Attorneys' Fees Amount and Service Award payments must be approved by the Court. The Court may award less than the amounts requested.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing on **April 27, 2026, at 10:00 a.m. E.T.**, by telephone, as ordered by the Court. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on Attorneys' Fees Amount and Service Awards payments. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking the Settlement Website **www.WTLDataSettlement.com** or calling **(844) 918-7626**.

20. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Class to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 15, the Court will consider it.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file an objection according to the instructions in Question 15, including all the information required. Your objection must be **mailed** to the Clerk of the Court, Class Counsel and Defendant's Counsel, at the mailing addresses listed above, **postmarked by no later than FEBRUARY 9, 2026**.

IF YOU DO NOTHING

22. What happens if I do nothing?

If you do nothing, you will not receive any settlement benefits from this settlement. If the settlement is granted final approval and becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or the other Releasees based on any claim that could have been or that was brought relating to the Data Incident.

ADDITIONAL INFORMATION

23. How do I get more information?

This Notice summarizes the settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at **www.WTLDataSettlement.com**. You may also call the Settlement Administrator with questions or request to receive a Claim Form at **(844) 918-7626**.

Questions? Go to www.WTLDataSettlement.com or call (844) 918-7626

24. What if my contact information changes or I no longer live at my address?

It is your responsibility to inform the Settlement Administrator of your updated information. You may contact the Settlement Administrator at the address below, by phone at **(844) 918-7626**, or by email at info@WTLDataSettlement.com.

Ward Transport & Logistics Data Settlement
c/o Analytics Consulting LLC
PO Box 2007
Chanhassen, MN 55317-2007

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