

Texas ENT Claims Administrator
P.O. Box 2440
Portland, OR 97208-2440

A proposed Settlement has been reached in a class action lawsuit known as *Lee et al. v. Texas Ear, Nose & Throat Specialists, PLLC*, Case No. 2021-84322 (“Lawsuit”), filed in the 113th Judicial District Court for Harris County, Texas.

What is this about? This Lawsuit arises out of unauthorized access to Texas ENT's systems and certain files containing sensitive information about Texas ENT's current and former patients and employees, but not limited to, names, dates of birth, medical record number, procedure codes, Social Security Numbers, and other types of personally identifiable information (collectively "Personal Information"), and which occurred between August 9, 2021, and August 15, 2021 (the "Data Incident"). Texas ENT disagrees with Plaintiffs' claims and denies any wrongdoing.

Who is a Settlement Class Member? You are a Settlement Class Member if you reside in the United States and were mailed written notification by Texas ENT that your Personal Information was or may have been compromised in the Data Incident.

What are the benefits? The Settlement provides the following benefits:

- **Documented Out-of-pocket Expense Reimbursement:** Up to \$300 for documented out-of-pocket expenses, including lost time.

- **Lost Time Reimbursement:** Reimbursement for up to three (3) hours of lost time spent dealing with the Data Incident (\$20 per hour).

- **Documented Extraordinary Loss Reimbursement:** Reimbursement for extraordinary losses, not to exceed \$3,000 per Settlement Class Member for documented monetary losses.

- **Credit Monitoring:** (1) Settlement Class Members whose Social Security Numbers were involved in the Data Incident can elect to enroll in two years of three-bureau credit monitoring; (2) Settlement Class Members who did NOT have Social Security Numbers involved in this Incident can elect to enroll in two years of Identity Force Rapid Response ID.

- **Information Security Improvements:** Texas ENT will also provide various security improvements.

You must file a claim by **October 23, 2023** by mail or online at www.TXENTSettlement.com to receive benefits from the Settlement.

What are my other rights?

- **Do Nothing:** If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any money; you must submit a claim to get any money.

- **Exclude yourself:** You can get out of the Settlement and keep your right to sue about the claims in this Lawsuit, but you will not get any money from the Settlement. You must exclude yourself by **October 23, 2023**.

- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be submitted by **October 23, 2023**. Detailed instructions on how to file a claim, get additional credit monitoring, exclude yourself, or object are on the Settlement Website www.TXENTSettlement.com. The Court will hold the Final Fairness Hearing on **December 5, 2023 at 1:30 p.m.** to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Attorneys' Fees and Expenses of \$195,000 and request a Class Representative service award of \$1,500 to each named Plaintiff, and to consider whether and if it should be approved. You may attend the hearing, but you don't have to. This is only a summary. For additional information, including a copy of the Settlement Agreement, Class Counsel's Application for Attorneys' Fees and Expenses, and other documents, visit www.TXENTSettlement.com or call **1-877-685-2830**.