

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If Allied-Locke Industries, Inc. (“Allied-Locke”) Notified You of a Data Security Incident, You May Be Eligible for Benefits From A Class Action Settlement.

This is not a solicitation from a lawyer, junk mail, or an advertisement. A court authorized this Notice.

This notice summarizes the proposed settlement reached in a lawsuit entitled *John Lightner et al. v. Allied-Locke Industries, Inc.*, Case No. 2024LA00004, in the Circuit Court of Lee County, Illinois (the “Lawsuit”). For the precise terms and conditions of the settlement, please see the Settlement Agreement available at www.AlliedLockeSettlement.com or by contacting the Settlement Administrator at 1-888-267-0289 or AlliedLockeSettlement@cptgroup.com.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

This notice may affect your rights – please read it carefully.

- The lawsuit alleges that between November 8, 2021, to November 14, 2021, Allied-Locke Industries, Inc. (“Allied-Locke”) experienced a network security event by unauthorized third-party actors. After an investigation, Allied-Locke became aware that unauthorized actors may have removed certain files and folders from portions of its network containing the personal identifiable information (“PII”) and protected health information (“PHI”) of individuals including names, addresses, Social Security numbers, dates of birth, financial account information, medical information, and health insurance information (the “Data Security Incident”). Allied-Locke maintains that it had meritorious defenses, and it was prepared to vigorously defend the lawsuit. The settlement is not an admission of wrongdoing or an indication that Allied-Locke has violated any laws, but rather the resolution of disputed claims.
- If you received this Notice, you have been identified as a Settlement Class Member. More specifically, you are a Settlement Class Member because you have been identified by the Settlement Administrator as an individual who received notice from Allied-Locke regarding information that was potentially compromised in the Data Security Incident.
- All Settlement Class Members can receive the following benefits from the Settlement: (1) up to \$500 per Settlement Class Member as reimbursement for documented out-of-pocket losses such as fees for credit reports, credit monitoring, or other identity theft insurance products, (2) up to \$3,500 per Settlement Class Member as reimbursement for documented extraordinary losses, for actual monetary losses caused by the Data Security Incident, (3) reimbursement for up to \$20 per hour for four (4) hours (up to \$80 total) of lost time spent dealing with the Data Security Incident (\$20 per hour) to be applied against the \$500.00 individual cap for Ordinary Loss or \$3,500.00 individual cap for Extraordinary Loss and (4) Settlement Class Members can elect to enroll in two years of one (1) bureau Credit Monitoring Services.

The deadline to submit a claim is November 19, 2025.

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim	You must submit a valid Claim to get money from this Settlement. Claim Forms must be submitted online by November 19, 2025 , or, if mailed, postmarked no later than November 19, 2025 .
Do Nothing	If you do nothing, you remain in the Settlement. You give up your rights to sue and you will not get any money or credit monitoring.

Exclude Yourself	<p>Get out of the Settlement. Get no money. Keep your rights. This is the only option that allows you to keep your right to sue about the claims in this Lawsuit. You will not get any money or credit monitoring from the Settlement.</p> <p>Your request to exclude yourself must be postmarked no later than October 20, 2025.</p>
File an Objection	<p>Stay in the Settlement but tell the Court why you think the Settlement should not be approved.</p> <p>Objections must be postmarked no later than October 20, 2025.</p>
Go to a Hearing	<p>You can ask to speak in Court about the fairness of the Settlement, at your own expense. <i>See</i> Question 18 for more details.</p> <p>The Final Fairness Hearing is scheduled for November 13, 2025, at 10:00 a.m. CT via Zoom.</p>

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BASIC INFORMATION

1. How do I know if I am affected by the Lawsuit and Settlement?

You are a Settlement Class Member if Allied-Locke identified you as being among those individuals impacted by the Data Security Incident, including all who were sent a notice of the Data Security Incident.

The Settlement Class specifically excludes: (i) Allied-Locke; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) 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 associated with the Data Security Incident or who pleads *nolo contendere* to any such charge.

This Notice explains the nature of the lawsuit and claims being settled, your legal rights, and the benefits to the Settlement Class.

2. What is this case about?

This case is known as *John Lightner et al. v. Allied-Locke Industries, Inc.*, Case No. 2024LA00004, filed on February 26, 2024, in the Circuit Court of Lee County, Illinois. The people who sued are called the “Plaintiffs” and the company they sued, Allied-Locke, is known as the “Defendant” in this case. Allied-Locke will be called “Defendant” in this Notice.

Plaintiffs filed a lawsuit against Defendant, individually, and on behalf of anyone whose personally identifiable information (“PII”) or protected health information (“PHI”) was potentially impacted as a result of the Data Security Incident.

This Lawsuit arises out of unauthorized access to Defendant’s systems and certain files containing sensitive information about Allied-Locke’s current and former employees, including, but not limited to, names, Social Security numbers, addresses, dates of birth, and financial account information, and/or medical information and/or health insurance information which occurred approximately between November 8, 2021 to November 14, 2021 (the “Data Security Incident”). After learning of the Data Security Incident, Defendant mailed notification to persons whose PII or PHI may have been impacted by the Data Security Incident. Subsequently, this Lawsuit was filed asserting claims against Defendant relating to the Data Security Incident.

Defendant denies any wrongdoing.

3. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost, disruption, and distraction of further litigation. The Representative Plaintiffs, Defendant, and their attorneys believe the proposed Settlement is fair, reasonable, and adequate and, thus, in the best interests for Settlement Class Members. The Court did not decide in favor of the Plaintiffs or Defendant. Full details about the proposed Settlement are found in the Settlement Agreement available at www.AlliedLockeSettlement.com.

4. Why is this a class action?

In a class action, one or more people called the “Class Representatives” or “Representative Plaintiffs” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.”

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

You are included in the Settlement if Allied-Locke identified you as being among those individuals impacted by the Data Security Incident, including all who were sent a notice of the Data Security Incident. If you are not sure whether you are included as a Settlement Class Member, or have any other questions about the Settlement, visit www.AlliedLockeSettlement.com, call toll-free at 1-888-267-0289, or write to *Lightner v. Allied-Locke Industries, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

The proposed Settlement will provide the following benefits to Settlement Class Members:

Expense Reimbursement

Documented Ordinary Losses: All Settlement Class Members who submit a valid and timely claim using the Claim Form attached below are eligible for reimbursement up to \$500 per Settlement Class Member for documented ordinary loss expenses (inclusive of Lost Time, as defined below) if: (a) the documented out-of-pocket expenses were incurred as a result of the Data Security Incident, (b) the expense was incurred after the date of the Data Security Incident (November 8, 2021), and (c) the expense is not already covered by one of the other benefits described in this Notice. Examples of out-of-pocket expenses covered by the Settlement are (but not limited to): bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, gasoline for local travel; and fees for credit reports, credit monitoring, or other identity theft insurance products. To receive reimbursement for any of the above-referenced documented ordinary loss expenses, Settlement Class Members must submit to the Settlement Administrator a valid and timely Claim Form, including necessary supporting documentation.

Lost Time Reimbursement: Settlement Class Members are also eligible to receive reimbursement for up to four (4) hours of lost time spent dealing with the Data Security Incident (calculated at the rate of \$20 per hour, for a total of up to \$80) to be applied against the \$500.00 individual cap for Ordinary Loss or \$3,500.00 individual cap for Extraordinary Loss. Settlement Class Members may receive reimbursement for lost time if the Settlement Class Member provides a brief description of the activities engaged in, the time spent on each such activity, and an attestation on the Claim Form that the activities they performed were related to the Data Security Incident.

Documented Extraordinary Loss Reimbursement: Settlement Class Members may also be eligible for reimbursement of documented extraordinary losses, up to \$3,500 per Settlement Class Member, for proven actual monetary losses. Documented Extraordinary Losses may include, but are not limited to, unreimbursed losses relating to fraud or identity theft, professional fees including attorneys' fees, accountants' fees, and fees for credit repair services, costs associated with freezing or unfreezing credit with any credit reporting agency, credit monitoring costs that were incurred on or after the Data Security Incident through the date of claim submission. To qualify, the loss must meet the following criteria: (i) it must be an actual, documented, and unreimbursed monetary loss; (ii) it must be more likely than not caused by the Data Security Incident; (iii) it must have been incurred after November 8, 2021, (the date of the Data Security Incident); and (iv) it must not be covered by any other reimbursement categories described in this Notice. The maximum reimbursement for documented extraordinary losses for any one Settlement Class Member is \$3,500.

Credit Monitoring: Settlement Class Members shall be offered an opportunity to enroll in two years of one (1) bureau Credit Monitoring Services to include credit monitoring with at least \$1,000,000 in identity theft insurance.

Remedial Relief: Defendant has made certain security changes in response to the Data Security Incident and the Lawsuit. Defendant will continue those security changes and will pay for those changes separate and apart from other settlement benefits.

7. How to submit a claim?

All claims will be reviewed by the Settlement Administrator for completeness and plausibility. You must file a Claim Form to get money from the proposed Settlement. Claim Forms must be submitted online by November 19, 2025, or postmarked no later than November 19, 2025. You can submit an online claim or download a Claim Form at www.AlliedLockeSettlement.com, or you can call the Settlement Administrator toll-free at 1-888-267-0289 for a Claim Form.

8. What am I giving up as part of the Settlement?

If you stay in the Settlement Class, you will be eligible to receive benefits, but you will not be able to sue Allied-Locke, and each of its past or present parents, subsidiaries, divisions, and related or affiliated entities, and each of its respective predecessors, successors, assigns, owners, directors, shareholders, members, officers, employees, principals, agents, attorneys, insurers, and reinsurers (collectively, the "Released Entities") regarding the claims in this case.

The Settlement Agreement, which includes all provisions about settled claims, releases, and Released Parties, is available at www.AlliedLockeSettlement.com.

The only way to keep the right to sue is to exclude yourself (see Question 10), otherwise you will be included in the Settlement Class, and, if the Settlement is approved, you give up the right to sue for the claims in this case.

9. Will the Class Representative receive compensation?

Yes. The Representative Plaintiffs will each receive a service award of up to \$5,000, to compensate them for their services and efforts in bringing the Lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Representative Plaintiffs.

EXCLUDE YOURSELF

10. How do I exclude myself from the Settlement?

If you do not want to be included in the Settlement, you must send a timely written request for exclusion, stating your full name, address, and telephone number. Your request for exclusion must: (a) state the name of the Lawsuit; (b) your full name and address; (c) contain your personal signature, or the signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf of; and (d) the words “Request for Exclusion” or a comparable statement that you do not wish to participate in the Settlement at the top of the communication.

Your written request for exclusion must be postmarked no later than **October 20, 2025**, to:

Lightner v. Allied-Locke Industries, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

Instructions on how to submit a request for exclusion are available at www.AlliedLockeSettlement.com or from the Claims Administrator by calling 1-888-267-0289.

If you exclude yourself, you will not be able to receive any cash benefit or credit monitoring from the Settlement and you cannot object to the Settlement at the Final Approval Hearing. You will not be legally bound by anything that happens in the Lawsuit, and you will keep your right to sue Defendant on your own for the claims that this Settlement resolves.

11. If I do not exclude myself, can I sue later?

No. If you do not exclude yourself from the Settlement, and the Settlement is approved by the Court, you forever give up the right to sue the Released Parties (listed in Question 8) for the claims this Settlement resolves.

12. What happens if I do nothing at all?

If you do nothing, you will be bound by the Settlement, if the Court approves it. You will not get any money or credit monitoring services from the Settlement, you will not be able to start or proceed with a lawsuit, and you will not be part of any other lawsuit against the Released Persons (listed in Question 8) about the settled claims in this case at any time.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed STRAUSS BORRELLI PLLC (called “Settlement Class Counsel”) to represent the interests of all Settlement Class Members in this case. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Settlement Class Counsel will apply to the Court for an award of combined attorneys' fees, costs, and expenses in an amount not to exceed \$100,000. A copy of Class Counsel's Motion for Attorneys' Fees, Costs, Expenses, and Service Award for Representative Plaintiff will be posted on the Settlement Website, www.AlliedLockeSettlement.com, before the Final Fairness Hearing. The Court will make the final decisions as to the amounts to be paid to Settlement Class Counsel and may award less than the amount requested by Settlement Class Counsel.

OBJECTING TO THE SETTLEMENT

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

If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you must file an objection with the Court telling it why you do not think the Settlement should be approved.

Objections must be submitted in writing and include all the following information:

- a) the name of the Lawsuit;
- b) your full name and current mailing address;
- c) a statement that states with specificity your grounds for your objection, as well as any documents that support your objection;
- d) a statement as to whether your objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- e) the identity of any attorneys representing you;
- f) a statement regarding whether you or your attorney will appear at the Final Approval Hearing;
- g) a list of all other lawsuits (if any) in which your attorney has submitted an objection to a class action settlement in the previous five years; and,
- h) your signature or your attorney's signature.

Your Objection must be postmarked no later than October 20, 2025, at:

ADDRESS:

Upon Class Counsel via mail and e-mail at:

Cassandra Miller
STRAUSS BORRELLI PLLC
One Magnificent Mile
980 N Michigan Avenue, Suite 1610
Chicago IL, 60611
cmiller@straussborrelli.com

Upon Allied's Counsel via mail and e-mail at:

James W. Davidson
O'Hagan Meyer LLC
One East Wacker Drive, Suite 3400
Chicago, Illinois 60601
jdavidson@ohaganmeyer.com

In addition, you must concurrently email or mail a copy of your objection to the Settlement Administrator, postmarked no later than October 20, 2025, to:

Lightner v. Allied-Locke Industries, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

If you do not submit your objection with all the above requirements, or if your objection is not received by October 20, 2025, you will be considered to have waived all Objections and will not be entitled to speak at the Final Fairness Hearing.

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

Objecting is simply 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 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 Settlement no longer affects you.

THE FINAL FAIRNESS HEARING

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

The Court will hold the Final Fairness Hearing on November 13, 2025, at 10:00 A.M. via Zoom (Meeting ID: 827 2801 2324, Passcode: 694825). The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check www.AlliedLockeSettlement.com for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be finally approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the award of attorneys' fees, costs, and expenses to Settlement Class Counsel and the request for a Service Award to the Representative Plaintiff.

18. Do I have to come to the hearing?

No. You are not required to come to the Final Approval Hearing. However, you are welcome to attend the hearing at your own expense.

If you submit an Objection, you do not have to come to the hearing to talk about it. If your objection was submitted properly and on time, the Court will consider it. You also may pay your own lawyer to attend the Final Approval Hearing, but that is not necessary. However, you must follow the requirements for making objections in Question 15, including the requirements for making appearances at the hearing.

19. May I speak at the hearing?

Yes. You can speak at the Final Approval Hearing, but you must ask the Court for permission. You cannot speak at the hearing if you exclude yourself from the Settlement.

DO NOTHING

20. What happens if I do nothing?

If you do nothing, you will not get any money from the Settlement, you will not be able to sue for the claims in this case, and you release the claims against Defendant and the Released Persons described in Question 8.

GET MORE INFORMATION

21. How do I get more information about the Settlement?

This is only a summary of the Settlement Agreement. If you want additional information about this lawsuit, including a copy of the Settlement Agreement, the Complaint, the Court's Preliminary Approval Order, Settlement Class Counsel's Motion for Attorneys' Fees, Costs, Expenses, and Service Award for Representative Plaintiff and more, please visit www.AlliedLockeSettlement.com, email AlliedLockeSettlement@cptgroup.com or call 1-888-267-0289. You may also contact the Settlement Administrator at *Lightner v. Allied-Locke Industries, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

**PLEASE DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT
OR LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, DEFENDANT, OR DEFENDANT'S
COUNSEL.**