

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Konnor Robison-Williams v. Visionary Integration Professionals, LLC

Case No. 24CV012543

Sacramento County Superior Court

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

You are not being sued.

Please read this Notice carefully and completely.

- A Settlement has been reached with Visionary Integration Professionals, LLC (“VIP” or “Defendant”), in a class action lawsuit concerning the targeted cyberattack on the Defendant’s computer systems that was discovered on or about September 21, 2023 (the “Data Incident”), in which certain files that contained private information may have been accessed.
- The lawsuit is captioned *Konnor Robison-Williams v. Visionary Integration Professionals, LLC*, Case No. 24CV012543, pending in the Sacramento County Superior Court (the “Action”).
- VIP denies each and all of the claims and contentions alleged against it in the Action and denies all charges of wrongdoing or liability alleged (or which could be alleged) in the Action, but has agreed to a settlement to avoid the costs and risks associated with continuing the litigation.
- You are included in the Settlement Class if you are a resident of the United States and you received a Notice Letter from VIP notifying you that your private information was compromised in the Data Incident.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.VIPSettlementCA.com . If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	August 25, 2025
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own legal counsel at your own expense.	July 26, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don’t like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	July 26, 2025
DO NOTHING	Unless you opt out of the settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

Questions? Call 1-877-365-1589 or Visit www.VIPSettlementCA.com



For complete information and to file a claim,
scan this QR code to go directly to the Settlement
website, www.VIPSettlementCA.com

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Basic Information

1. Why was this Notice issued?

The Sacramento County Superior Court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is captioned *Konnor Robison-Williams v. Visionary Integration Professionals, LLC*, Case No. 24CV012543, pending in the Sacramento Superior Court. The person who filed this lawsuit is called the “Plaintiff” or “Class Representative” and the entity they sued, VIP, is called the “Defendant.”

2. What is this Lawsuit about?

This lawsuit alleges that private and sensitive information may have been impacted due to the unauthorized access to Defendant’s computer systems, which Defendant discovered on or about September 21, 2023 (the “Data Incident”).

3. What is a Class Action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are known as “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “class” or “class members.” One court resolves the lawsuit for all class members, except for those who opt out from a settlement. In this Settlement, the Class Representative is Konnor Robison-Williams, and everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or the Defendant. Plaintiff and the Defendant have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiff and their attorneys think the Settlement is best for all Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Settlement Class includes all persons residing in the United States who were sent a Notice Letter notifying them of the Data Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (i) VIP and VIP’s parents, subsidiaries, affiliates, officers and directors, and any entity in which VIP has a controlling interest; (ii) all individuals who make a timely election to be excluded from this proceeding using the correct protocol for opting out; (iii) the attorneys representing the Parties in the Litigation; (iv) all judges assigned to hear any aspect of the Litigation, as well as their immediate family members; and (v) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the Data Incident, or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by contacting the Settlement Administrator at:

Email: VIPSettlementCA@noticeadministrator.com

Phone (*toll free, 24/7*): 1-877-365-1589

Mail: VIP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2002, Chanhassen, MN 55317-2002.

You may also view the Settlement Agreement at www.VIPSettlementCA.com.

The Settlement Benefits

7. What does the Settlement provide?

VIP will provide a number of benefits under the Settlement Agreement. You may claim the Identity-Theft Protection and Credit Monitoring benefit, Expense Reimbursement, and reimbursement for lost time. Settlement Class Members residing in California may also claim a California Statutory Payment.

Identity-Theft Protection and Credit Monitoring. All Class Members may claim two years of identity theft protection and credit monitoring services provided by a credit monitoring bureau. This protection includes up to \$1 million in identity theft insurance.

Expense Reimbursement. Class Members who suffered an actual, documented monetary loss caused by (1) injurious misuse of the Settlement Class Member's personally identifiable information ("PII") or (2) fraud associated with the Settlement Class Member's PII may claim reimbursement for the loss. This reimbursement is capped at \$1,000 per Class Members.

Lost Time. All Settlement Class Members are eligible to receive reimbursement lost time, including time spent monitoring accounts, reversing fraudulent charges, or otherwise dealing with the aftermath / clean-up of the breach, at the rate of twenty dollars and no cents (\$20.00) per hour for up to four (4) hours.

California Statutory Claim Payment. Class members who are California residents may elect to receive a one-time cash payment of \$100.00.

If you have questions about any of these benefits, or how to file a claim, you can contact the Settlement Administrator at:

Email: VIPSettlementCA@noticeadministrator.com

Phone (*toll free, 24/7*): 1-877-365-1589

Mail: VIP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2002, Chanhassen, MN 55317-2002.

You may also view the Settlement Agreement at www.VIPSettlementCA.com.

8. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The "Release" section of the Settlement Agreement together with the Amendment to Class Action Settlement Agreement describe the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement and Amendment to Class Action Settlement Agreement are available for review at www.VIPSettlementCA.com.

Submitting a Claim Form for Settlement Benefits

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.VIPSettlementCA.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at: VIP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2002, Chanhassen, MN 55317-2002.

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-877-365-1589, by email VIPSettlementCA@noticeadministrator.com, or by U.S. mail at the address above.

10. What is the deadline for submitting a claim?

If you are submitting a Claim Form online, you must do so by **August 25, 2025**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, along with any supporting documentation, must be mailed so it is **postmarked no later than August 25, 2025**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on August 29, 2025. If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them.

Settlement benefits will be distributed if the Court grants final approval of the Settlement and after any appeals are resolved, or after the period to seek an appeal has expired.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court appointed Milberg Coleman Bryson Phillips Grossman, PLLC, to represent you and other Class Members (“Class Counsel”).

13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will Class Counsel be paid?

Class Counsel will seek Court approval for attorneys’ fees and litigation costs not to exceed \$125,000. These fees and costs, as well as the costs of administration, will be paid by VIP.

Excluding Yourself from the Settlement

15. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendant about the legal issues in this case, there are steps that you must take to exclude yourself from the Settlement Class. This is called requesting an exclusion from, or “opting out” of the Settlement Class. The deadline to submit a request for exclusion from the Settlement is **July 26, 2025**.

To exclude yourself from the Settlement, you must individually sign and timely submit written notice of such intent to the designated Post Office box established by the Claims Administrator. Settlement Class Members will only be able to submit an opt-out request on their own behalf; mass or class opt-outs will not be permitted. The written notice must clearly manifest a Person’s intent to be excluded from the Settlement Class.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, **postmarked no later than July 26, 2025**.

VIP Data Incident Settlement
ATTN: Exclusion Request
c/o Analytics Consulting LLC
PO Box 2002
Chanhassen, MN 55317-2002

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

Commenting on or Objecting to the Settlement

16. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member and do not like a portion or all of the Settlement, you can object to it, if you choose. You can give reasons why you think the Court should not approve it. The Court will consider your views.

For an objection to be considered by the Court, the objection must include the following, or information substantially similar to the follow:

1. your full name, address, telephone number, and e-mail address (if any);
2. The case name and docket number (*Konnor Robison-Williams v. Visionary Integration Professionals, LLC*, Case No. 24CV012543)
3. information identifying you as a Class Member, including proof that you are a member of the Settlement Class (e.g., copy of original notice of the Data Incident);
4. a written statement of all grounds for the objection, accompanied by any legal support for the objection you believe is applicable;
5. the identity of any and all counsel representing you in connection with the objection;
6. a statement as to whether you and/or your counsel will appear at the Final Fairness Hearing; and
7. your signature and the signature of your duly authorized attorney or other duly authorized representative, if any (along with documentation setting forth such representation).

To be timely, a written notice of an objection containing the above information must be mailed to Class Counsel and counsel for VIP, no later than **July 26, 2025**.

Class Counsel	Counsel for VIP
John Nelson Milberg Coleman Bryson Phillips Grossman, PLLC 402 W. Broadway, Suite 1760 San Diego, CA 92101	Jennifer Oliver Buchanan Ingersoll & Rooney LLP 600 W. Broadway, Suite 1100 San Diego, CA 92101

If you do not comply with the requirements for objecting you will waive and forfeit any and all rights you may have to appear separately and/or to object to the Settlement, and will be bound by all the terms of the Settlement and by all proceedings, orders and judgments in the Litigation.

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

The Court's Final Approval Hearing

18. When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **August 29, 2025 at 9:00 a.m., Pacific Time**, in Department 23 of the Sacramento County Superior Court, at 720 9th St, Sacramento, CA 95814.

At the final approval hearing, the Court will consider whether to approve the Settlement, how much attorneys' fees and costs to award to Class Counsel for representing the Settlement Class, and whether to award a Service Award of \$1,500 to the Class Representative who brought this Action on behalf of the Settlement Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your attorney may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check www.VIPSettlementCA.com for updates.

19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection

on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider an objection that was filed on time.

If I Do Nothing

20. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will give up the rights described in Question 8, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues resolved by this Settlement as more fully described in the Settlement Agreement and Amendment to Class Action Settlement Agreement available for review at www.VIPSettlementCA.com. In addition, if you do nothing, you will not receive a benefit from this Settlement.

Getting More Information

21. 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 the Settlement Website, www.VIPSettlementCA.com.

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: VIPSettlementCA@noticeadministrator.com

Phone (*toll free, 24/7*): 1-877-365-1589

Mail: VIP Data Incident Settlement, c/o Analytics Consulting LLC, PO Box 2002, Chanhassen MN 55317-2002.

You may also view the Settlement Agreement at www.VIPSettlementCA.com.

Publicly filed documents can also be obtained by visiting the office of the Clerk of the Court, Sacramento Superior Court, 720 9th St, Sacramento, CA 95814.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT



For complete information and to file a claim, scan this QR code to go directly to the Settlement website, www.VIPSettlementCA.com