

The logo for Epiq Precision features the word "epiq" in a lowercase, white, sans-serif font, followed by "precision" in a similar font. A blue arrow points from the 'i' in "epiq" towards the 'p' in "precision". The background of the top half of the page is a close-up, artistic photograph of a watch mechanism with a blue dial and a yellow needle.

Where a data breach results in a negotiated settlement, our in-house expert notice firm, Hilsoft Notifications works with clients to develop legal notice plans, facilitate claims review and processing, and ensure class members receive appropriate remedies. We've handled some of the largest data breach settlement administrations in the nation, and offer a scalable, global infrastructure for providing related services.

Representative cases

Premera Blue Cross Security Incident: In 2014, Premera Blue Cross was the target of an external criminal-cyberattack that could have accessed patient's personal information including names, addresses, birthdates, Social Security numbers and protected health information. In 2019, a settlement was reached establishing a \$32 million settlement fund to pay for credit monitoring services, provide cash payments for out-of-pocket losses and time spent on the Security Incident. Epiq mailed over 8.6 million notices to class members and Hilsoft designed a media plan with notices appearing in the Wall Street Journal and geo-targeted online media. Final approval was granted in 2020 approving payment to more than 825,000 class members and offering free credit monitoring to more than 675,000 class members.

In re Community Health Systems Data Breach Settlement: In 2014, Community Health Systems Professional Services Corporation's computer network system was the target of an external criminal-cyberattack affecting 6 million patients. The Settlement provides up to \$3.1 million for out-of-pocket expenses and charges that were

incurred from the Security Incident, and for other unreimbursed monetary losses from fraud or identity theft. Epiq provided direct mail notice to over 6 million class members and Hilsoft designed a targeted online media plan. Final approval granted.

Adlouni v. UCLA Health Systems: The lawsuit alleges The Regents failed to prevent cyberattackers from accessing sensitive and personal information stored on UCLA Health's computer network. It is disputed whether the cyberattackers accessed or removed sensitive and personal information on the network. The parties agreed to settle the lawsuit and provide free credit monitoring and insurance. In total, Epiq sent more than 6 million notices, including two separate reminder notices. More than 125,000 class members enrolled for free credit monitoring, and a bilingual call center was deployed to support class members. Final Approval was granted on June 28th, 2019. The parties agreed to settle the lawsuit and provide free credit monitoring and insurance, reimbursement of up to \$5,000 for out-of-pocket costs incurred to prevent identity theft and reimbursement of up to \$20,000 for unreimbursed losses associated with the unauthorized use of personal information and identity theft.

Class Action Notification and Administration

TJX Security Breach Litigation: In 2007, TJX Co., the parent company of T.J. Maxx and other retailers, experienced one of the largest data breaches in history when more than 45.6 million customer credit and debit cards were allegedly exposed. The data stolen from TJX was used by thieves to create dummy credit cards for purchase of retail gift cards throughout the state of Florida. In November of 2007, a settlement was reached in the United States Court for the District of Florida for up to \$40.9 million providing benefits to consumers affected by the security breach. Epiq mailed over 450,000 notices to known class members and Hilsoft designed and implemented a comprehensive media plan with notices appearing in over a thousand newspapers and dozens of consumer magazines across the United States and Canada. Final approval granted.

In re: Countrywide Financial Corp. Customer Data Security Breach Litigation: With a class size of 17.2 million, the Countrywide Data Breach matter is one of the largest data breach class action settlements ever in the consumer finance space. Epiq provided direct mail notice to more than 10 million class members and Hilsoft's media plan included notices appearing in over 900 newspapers and several major consumer publications nationwide. Epiq fielded over 400,000 phone calls, more than half of which resulted in personalized interaction with one of our in-house representatives fluent in both Spanish and English. Hilsoft also produced a first-of-its kind video for the website instructing claimants on how to fill out the claim form. The settlement received final approval in the Western District of Kentucky.

Beringer v Certegy Check Services: The settlement in the Middle District of Florida involved the alleged theft of confidential information for millions of consumers from Certegy's records. The class action settlement provided for a fund of \$4 million for reimbursement of out-of-pocket expenses, and an uncapped fund for reimbursement of ID-theft-related expenses as well as two years of credit monitoring. Epiq sent over 6 million notices to known class members and the Hilsoft-designed media plan included notices in over 970 newspapers nationwide

and in several of the top consumer magazines in the country. The toll-free line received over a million minutes of calls and the website received over 125 million hits. Final approval granted.

In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litigation: In 2008, an intrusion into Heartland Payment Systems, Inc.'s processing system occurred, allegedly affecting tens of millions of cardholders. In 2010, a settlement was reached that provided benefits to consumers affected by the security breach. Because of the nature of the breach, names and contact information for individual class members did not exist. The Hilsoft-designed notice plan included notice in hundreds of newspapers nationwide, several top consumer magazines and online via an extensive banner notice effort. The notice plan and settlement received final approval from Judge Lee Rosenthal in the Southern District of Texas.

VA Security Breach: On May 3, 2006, computer equipment was stolen from the home of a Veterans' Affairs employee, which allegedly affected 26.5 million people. In 2009, the Veteran Affairs agreed to settle the lawsuit for \$20 million. Names and contact information for those affected by the alleged breach were not reasonably determinable, so Hilsoft designed a media plan with notices appearing in hundreds of newspapers and magazines nationwide – including several targeted to military veterans. Validated claims-holders were paid the actual cost of their out-of-pocket expenses up to \$1,500. The minimum payment for each valid claim was \$75. Final approval in the District of Columbia was granted.

By the numbers:

110M+ Class members in administered settlements

98K Square-foot contact center

1K+ Contact center agent capacity

80% Inbound calls answered within 30 seconds

30M+ Direct mail notices sent

People. Partnership. Performance.

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