

**Subject Line:** CareCentrix Email Security Incident – Class Action Settlement

*Sarah Hapka, individually and on behalf of all others similarly situated v. CareCentrix, Inc.,  
No. 2:16-cv-02372 (D. Kan.).*

**TO: All current or former employees of CareCentrix, Inc. (“CareCentrix”) whose identifying information was disclosed in a security incident announced by CareCentrix in March 2016 (“the E-mail Security Incident”).**

This is not an advertisement. This is a Court approved summarized notice.  
The complete notice can be viewed on the settlement website at [www.CareCentrixDataSettlement.com](http://www.CareCentrixDataSettlement.com).

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### **What is this about?**

This NOTICE is to inform you of a proposed settlement in the class action lawsuit styled *Sarah Hapka, individually and on behalf of all others similarly situated v. CareCentrix, Inc.*, No. 2:16-cv-02372 (D. Kan.) and a court hearing regarding that Settlement that you may choose to attend. Your rights may be affected by the legal proceedings in this action.

In March 2016, CareCentrix announced that it was targeted by a “spoofing” scam, and released the 2015 Internal Revenue Service Wage and Tax Statements (W-2 Forms) of approximately 1,986 current and former CareCentrix employees to an unknown third party. The information contained on the W-2 Forms included employees’ full names, addresses and ZIP codes, dates of birth, wages, and Social Security Numbers.

This class action lawsuit was filed by an individual affected by the breach in the United States District Court for the District of Kansas. The judge overseeing the case is the Honorable Kenneth G. Gale. The individual who sued is called the “Plaintiff.” CareCentrix is the “Defendant.” The most recent version of the lawsuit, which describes the specific legal claims alleged by the Plaintiff, is available at [www.CareCentrixDataSettlement.com](http://www.CareCentrixDataSettlement.com).

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### **Who is a Class Member?**

If you receive this notice then you are a “Settlement Class Member” because your information was disclosed in the E-mail Security Incident and you may be entitled to reimbursement for out-of-pocket losses and free credit monitoring services under this settlement. The Court still must decide whether to approve the settlement. No payments will be made until after the Court grants final approval of the settlement and all appeals, if any, are resolved.

You are a member of the Settlement Class if:

- You received a notice from CareCentrix that your information was disclosed; or
- You received this settlement notice by mail or email stating that you are a class member.

Excluded from the settlement are:

- Officers, directors, legal representatives, heirs, and assigns of CareCentrix, any parent or subsidiary entity of CareCentrix, or of any entity that is controlled by CareCentrix;
- The presiding judge and any judicial staff involved in the lawsuit, including their immediate family members; and
- Any class member who excludes themselves from the settlement.

## What are the Benefits?

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The settlement provides the following benefits:

- Reimbursement for Out-of-Pocket Losses: CareCentrix will reimburse settlement class members for documented, unreimbursed out-of-pocket losses fairly traceable to the E-mail Security Incident, up to \$5,000 per individual (“Out-of-Pocket Losses”). Alternatively, if you experienced actual, documented tax return fraud fairly traceable to the E-mail Security Incident, you may make a claim for a single payment of \$200 and forego any other claim for unreimbursed expenses.
- Three-Bureau Credit Monitoring Services: All settlement class members are also eligible to enroll in twenty-four (24) months of Experian Identity Works credit monitoring services at no cost, regardless of whether you submit a claim for Out-of-Pocket Losses. This service includes daily credit monitoring of your credit file at all three major credit reporting agencies (Experian, Equifax, and TransUnion), a \$1 million identity theft insurance policy, identity restoration services, and additional features discussed below (“Credit Monitoring Services”). Activation details will be made available to settlement class members who timely claim this benefit.
- Identity Restoration Services: Regardless of whether you make a claim for Out-of-Pocket Losses or Credit Monitoring Services, all Settlement Class Members affected by the E-mail Security Incident will be eligible to take advantage of twenty-four (24) months of identity restoration services offered through Experian, including professional fraud resolution assistance to help with identity recovery and restoration in case you experience identity theft or fraud in the future (“Identity Restoration Services”).
- CareCentrix Business Practices: CareCentrix has also agreed to maintain certain data security measures, including technical security barriers that limit the flow of fraudulent emails, and an employee cybersecurity training program.

For more details on these benefits visit the settlement website. In addition to the information listed on the settlement website, more details about Experian’s Identity Restoration Services for Settlement Class Members will be provided to you by mail and email after the settlement becomes final.

## What are my rights and options?

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To receive Credit Monitoring Services or reimbursement for Out-Of-Pocket Losses, you must submit a Claim, either online at the settlement website by **January 29, 2018** or by mail and postmarked by **January 29, 2018**. If you make a claim under the settlement you will be releasing all of your legal claims relating to the E-mail Security Incident against CareCentrix when the Settlement becomes final.

If you Opt-Out, you preserve your right to pursue a separate lawsuit against CareCentrix about these claims, but you will receive no payment. Your Opt-Out request must be postmarked by **December 29, 2017**.

To Object to the Settlement, you must submit an Objection in writing that complies with the requirements in the Settlement Notice available on the website. Your Objection must be postmarked and sent to the Settlement Administrator on or before **December 29, 2017**.

If you do nothing, you will receive no Credit Monitoring Services or reimbursement for Out-Of-Pocket Losses and have no right to sue later for the Claims released by the Settlement.

The Court will hold a Final Approval Hearing before the Honorable Kenneth G. Gale at 440 U.S. Courthouse, 500 State Avenue, Kansas City, Kansas 66101, on **February 15, 2018 at 1:00 P.M.** to decide whether to approve the Settlement and to award Attorneys' Fees up to \$475,000 and reimbursement for costs and expenses up to \$25,000 to be paid by CareCentrix as well as \$2,500 to the named plaintiff as the Class Representative Service Award. The application for fees and expenses will be posted on the website below, no later than **January 25, 2018**, after they are filed. You may attend the Final Approval Hearing, but you don't have to.

More details about Experian's Identity Restoration Services for Settlement Class Members will be provided to you by mail and email after the settlement becomes final.

**For more information, please visit [www.CareCentrixDataSettlement.com](http://www.CareCentrixDataSettlement.com), call 1-844-528-0183 or write to Hapka v. CareCentrix, Inc., c/o Heffler Claims Group, P.O. Box 59419, Philadelphia, PA 19102-9419.**