NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

District Court of Jefferson County, Colorado

Kathy Linneman, et al. v. United Food and Commercial Workers Union Local No. 7
Case No. 2025CV31569

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

If your Private Information was potentially involved in a Data Incident that took place at United Food and Commercial Workers Union Local No. 7 on or around December 11, 2024, you may be entitled to Settlement Benefits from a class action settlement.

- A Settlement has been proposed in a class action lawsuit against United Food and Commercial Workers Union Local No. 7 ("Defendant") relating to the incident discovered on or around December 11, 2024 (the "Data Incident"). Defendant determined that certain files may have been accessed without authorization, and, on or around September 22, 2025, sent out notices to potentially impacted individuals. The Action alleges that Defendant was negligent or otherwise responsible for failing to prevent the Data Incident from occurring. Defendant denies all allegations. The Parties have reached a Settlement to resolve the claims brought in the Action and to provide relief to Settlement Class Members.
- If you received a notice from Defendant that your Private Information may have been impacted as a result of the Data Incident, you are included in this Settlement as a "Settlement Class Member."
- Under the Settlement, Defendant has agreed to pay, or cause to be paid, for the following: (a) Cash Payments for Documented Losses of up to $3,000.00; (b) Cash Payments for Lost Time for dealing with the Data Incident (up to three (3) hours at $25.00 per hour); (c) two years of Credit Monitoring; (d) Alternative Cash Payment of $50.00 in lieu of Cash Payments for Lost Time and Documented Losses; (e) Settlement Administration Costs; and (f) Court-awarded Attorneys' Fees and Costs, and Service Awards.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights and Options		Deadline
DO NOTHING	You will not receive any Settlement benefits. You will remain a member of the Settlement Class, be bound by the Settlement if it is approved by the Court and give up the right to sue Defendant over the claims resolved by the Settlement.	No Deadline
SUBMIT A CLAIM FORM	The only way to receive Settlement benefits. Claims must be submitted by December 14, 2026**.**	**December 14, 2026**
EXCLUDE YOURSELF	If you ask to be excluded, you will not be able to enroll in credit monitoring or receive a cash payment, but you may be able to file your own lawsuit against Defendant, for the same claims. This is the only option that leaves you the potential to file your own lawsuit against Defendant for the claims that are being resolved by the Settlement. To be effective, you must submit a request for exclusion by the deadline.	**December 14, 2026**
OBJECT	If you do not exclude yourself from the Settlement Class, you may submit an objection telling the Court why you do not like the Settlement. If your objection is overruled, you will be bound by the Settlement.	**December 14, 2026**

These rights and options**—and the deadlines to exercise them**—are explained in this Notice. The Court in charge of this case must still decide whether to approve the Settlement and the requested attorneys' fees and costs, service awards and administration costs. No Settlement benefits or payments will be provided unless and until the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. Why is this Notice being provided?

A court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get them.

The case is known as *Kathy Linneman, et al. v. United Food and Commercial Workers Union Local No. 7,* Case No. 2025CV31569 currently pending in the District Court of Jefferson County, Colorado (the "Action"). The people who filed this lawsuit are referred to as the "Plaintiffs" or "Class Representatives," and the entity sued is referred to as "Defendant."

2. What is this lawsuit about?

The lawsuit arises from the Data Incident. On or around December 11, 2024, Defendant discovered that unauthorized third parties potentially gained access to its computer systems. Plaintiffs allege that Defendant did not adequately protect Private Information and assert claims including negligence, breach of implied contract, and unjust enrichment.

Defendant denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that any law has been violated. Defendant denies all other claims made in the Action. By entering into the Settlement, Defendant is not admitting any wrongdoing.

3. Why is the lawsuit a class action?

In a class action, the Class Representatives sue on behalf of all people who are alleged to have similar claims. Together, in the context of a settlement like this one, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely opt out of the Settlement Class.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the claims made in this Action. The Action did not go to trial, and the Court did not decide in Plaintiffs' or Defendant's favor. Instead, Plaintiffs and Defendant agreed to settle the Action. Plaintiffs and the attorneys for the Settlement Class ("Class Counsel") believe the Settlement is best for all Settlement Class Members because of the Settlement benefits made available under the Settlement, the risks and uncertainty associated with continued Action, and the nature of the defenses raised by Defendant.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are a Settlement Class Member if your Private Information may have been impacted as a result of the Data Incident that took place on or around December 11, 2024. If you are not sure whether you are a Settlement Class Member, you may contact the Settlement Administrator at 1-888-261-1463 or email UFCW7DataSettlement@cptgroup.com.

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are (a) all directors and officers of Defendant; (b) governmental entities; (c) the Judge assigned to the Action, that Judge's immediate family, and Court staff; and (d) all Settlement Class Members who properly and timely opt-out of the Settlement.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.UFCW7DataSettlement.com or call the Settlement Administrator's toll-free number at 1-888-261-1463 or email UFCW7DataSettlement@cptgroup.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

The Settlement includes the following benefits, all of which will be paid by or on behalf of Defendant: (a) Cash Payments for Documented Losses of up to $3,000.00; (b) Cash Payments for Lost Time for dealing with the Data Incident (up to three (3) hours at $25.00 per hour); (c) two years of Credit Monitoring; (d) Alternative Cash Payment of $50.00 in lieu of Cash Payments for Lost Time and Documented Losses; (e) Settlement Administration Costs; and (f) any Court-awarded Attorneys' Fees and Costs, and Service Awards. Settlement Class Members must submit a Valid Claim for Cash Payments and Credit Monitoring. Settlement Class Members who do not submit a Valid Claim or who opt-out of the Settlement will not receive any form of Cash Payment or Credit Monitoring.

Cash Payment for Documented Losses. All Settlement Class Members are eligible to submit a Claim for a Cash Payment for Documented Losses for up to a maximum $3,000.00 per Settlement Class Member. Settlement Class Members must present reasonable documentation of losses related to fraud and/or identity theft as a result of the Data Incident. To receive payment for Documented Losses, a Settlement Class Member must complete and submit a Claim Form and include documentation in support of the Claim. Except as expressly provided herein, personal certifications, declarations, or affidavits from the Settlement Class Member do not constitute proper documentation, but may be included to provide clarification, context, or support for other submitted reasonable documentation. Settlement Class Members shall not be reimbursed for expenses if they have been reimbursed for the same expenses by another source, including compensation provided in connection with any credit monitoring and identity theft protection product or through a financial institution's consumer fraud policies. If a Settlement Class Member does not submit documentation supporting a loss, or if the Settlement Administrator rejects for any reason the Settlement Class Member's Claim and the Settlement Class Member fails to cure the Claim, the Claim for Documented Losses will be rejected and the Claim will be treated as a Claim for an Alternative Cash Payment.

Cash Payment for Lost Time. Settlement Class Members may also submit a Claim for a Cash Payment for Lost Time spent remedying issues related to the Data Incident. Settlement Class Members may claim up to three (3) hours at a rate of $25.00 per hour. In order to receive payment for Lost Time, the Settlement Class Member must describe the time spent on the Claim Form and must attest that the time claimed was actually spent as a result of the Data Incident. If a Settlement Class Member does not submit a description of the time spent, or if the Settlement Administrator rejects for any reason the Settlement Class Member's Claim for Lost Time and the Settlement Class Member fails to cure the Claim, the Claim for Lost Time will be rejected and the Claim will be treated as a Claim for an Alternative Cash Payment.

Alternative Cash Payment. In lieu of claiming a Cash Payment for Lost Time and/or Documented Losses, a Settlement Class Member may elect to receive an Alternative Cash Payment up to $50.00, which is a cash payment that does not require the submission of any supporting documentation.

Credit Monitoring. In addition to claiming any form of Cash Payment, Settlement Class Members may elect to receive an enrollment code for two years of one-bureau credit monitoring. The Credit Monitoring will provide benefits, including, but not limited to credit monitoring, dark web monitoring, real-time authentication alerts, high-risk transaction monitoring, lost wallet protection, and insurance coverage for up to $1,000,000 for identity theft.

Non-Monetary Relief. Defendant undertook significant remediation measures following the Data Incident which Defendant shall detail in a confidential Declaration provided to Class Counsel and, upon request by the Court, to the Court under seal. The costs of such implemented or to-be-implemented remedial measures are the responsibility of the Defendant and will not in any way reduce the Settlement Amount.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. Do I need to submit a claim?

If you would like to receive benefits under the Settlement, you must submit a Claim Form. If you do not want to give up your right to sue Defendant about the Data Incident or the issues raised in this case, you must exclude yourself, or opt out, from the Settlement Class. See Question 17 below for instructions on how to exclude yourself. If you wish to object to the Settlement, you must (a) remain a Settlement Class Member (*i.e.*, you may not exclude yourself from the Settlement Class by opting out and also object to the Settlement) and (b) submit a written objection. See Question 20 below for instructions on how to submit an objection.

10. How do I submit a claim?

You must submit a valid and timely Claim Form to the Settlement Administrator by **December 14, 2026.** You will need your name, address, telephone number, and email address (if applicable) and your CPT ID and Passcode provided in the Notice sent to you, to file a Claim Form.

Claim Forms can be submitted by mail or online at www.UFCW7DataSettlement.com. If by mail, the Claim Form must be postmarked by **December 14, 2026.** You may request that a Claim Form be mailed to you by calling 1-888-261-1463 or by writing to:

Linneman v. United Food and Commercial Workers Union Local No. 7
PO Box 19504
Irvine, CA 92623
UFCW7DataSettlement@cptgroup.com

11. What am I giving up so as to receive Settlement Benefits or to stay in the Settlement Class?

Unless you timely submit an opt-out request to exclude yourself, you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders will apply to you and legally bind you. You will not be able to sue or be part of any other lawsuit against Defendant and Released Parties about the legal issues in the Action that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

12. What are the Released Claims?

The Settlement Agreement in Section XI describes the Release, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.UFCW7DataSettlement.com, in the public Court records on file in this Action. You can also request a copy of the Settlement Agreement be mailed to you by calling or writing to the Settlement Administrator. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

13. What happens if my contact information changes after I submit a claim or receive the Notice?

If you change your mailing address or email address after you submit a Claim Form or after you received the Notice, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by writing to:

Linneman v. United Food and Commercial Workers Union Local No. 7
PO Box 19504
Irvine, CA 92623
UFCW7DataSettlement@cptgroup.com

14. When will I receive my Settlement Benefits?

If you file a timely and valid Claim Form, payment will be provided by the Settlement Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check the Settlement Website at www.UFCW7DataSettlement.com, email UFCW7DataSettlement@cptgroup.com or contact the attorneys in Question 15, below, for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court has appointed Leanna A. Loginov of Shamis & Gentile, P.A., and David Lietz of Milberg PLLC as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in the Action.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court for an award of attorneys' fees and costs up to $345,000.00. They will also ask the Court to approve a service award in the amount of $2,500.00 to each of the five named Plaintiffs. If awarded by the Court, attorneys' fees and costs and the service awards will be paid by or on behalf of Defendant. The Court may award less than these amounts.

A copy of Class Counsel's motion for attorneys' fees and costs, and service awards will be made available on the Settlement Website at www.UFCW7DataSettlement.com before the deadline for submission of objections. You may also request a copy be mailed to you by calling the Settlement Administrator.

OPTING OUT OF THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue Defendant on your own based on the claims raised in the Action or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from, or opting out of, the Settlement.

17. How do I get out of the Settlement?

The opt-out request must be personally signed by the Settlement Class Member and contain the name, address, telephone number, and email address (if any), and include a statement indicating a request to be excluded from the Settlement Class in *Kathy Linneman, et al. v. United Food and Commercial Workers Union Local No. 7*, Case No. 2025CV31569. The opt-out request must be postmarked and sent to the Settlement Administrator at the following address by December 14, 2026**:**

Linneman v. United Food and Commercial Workers Union Local No. 7
Attn: Opt-outs
PO Box 19504
Irvine, CA 92623

18. If I opt-out, can I get anything from the Settlement?

No. If you opt out, you are telling the Court you do not want to be part of the Settlement. You can only get Settlement benefits if you stay in the Settlement. If you opt out, do not submit a Claim Form.

19. If I do not opt-out, can I sue the Defendant for the same thing later?

No. Unless you opt out, you give up any right to sue Defendant and Released Parties for the claims this Settlement resolves and releases relating to the Data Incident. You must opt out of the Action to start your own lawsuit against the Defendant or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member and do not exclude yourself, you may object to the Settlement by mailing a written objection no later than December 14, 2026.

For an objection to be considered by the Court, the objection must state:

a. the objector's full name, mailing address, telephone number, and email address (if any);

b. all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;

c. the number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;

d. the identity of all counsel (if any) who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Motion for Attorneys' Fees, Costs, and Service Awards, and whether they will appear at the Final Approval Hearing;

e. the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection, and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in

each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;

f. whether the objector and/or objector's counsel will appear at the Final Approval Hearing;

g. a list of all persons who will be called to testify, including objector, at the Final Approval Hearing in support of the objection (if any);

h. a statement confirming whether the objector and/or objector's counsel utilized any form of artificial intelligence in preparing the objection; and

i. the objector's signature (an attorney's signature is not sufficient).

Class Counsel and/or Defendant's Counsel may conduct limited discovery on any objector or objector's counsel, including taking depositions and propounding document requests.

To be timely, written notice of an objection in the appropriate form must be mailed and postmarked no later than December 14, 2026, to the following:

Clerk of the Court	Class Counsel	Defendant's Counsel	Settlement Administrator
Clerk of the Court District Court of Jefferson County, Colorado 100 Jefferson County Parkway Golden, CO 80401	David K. Lietz Milberg, PLLC 5335 Wisconsin Ave. NW, Suite 440 Washington, D.C. 20015 Leanna A. Loginov Shamis & Gentile, P.A. 14 NE 1st Ave, Suite 705 Miami, FL 33132	David Ross Brian H. Myers Wilson Elser LLP 1500 K St., NW Suite 330 Washington, D.C. 20005	United Food Data Incident Attn: Objections PO Box 19504 Irvine, CA 92623

21. What is the difference between objecting and asking to opt-out?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (meaning you do not opt out of the Settlement). Opting out of the Settlement is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt out, you cannot object to the Settlement.

THE FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing on January 13, 2027, at 3:00 p.m., before Judge Ryan P. Loewer at the District Court of Jefferson County, Colorado, via Webex (https://judicial.webex.com/meet/Ryan.Loewer) or in Courtroom 540, located at 100 Jefferson County Parkway, Golden, CO 80401.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's application for attorneys' fees, costs, and the service awards to Plaintiffs. If there are objections, the Court will consider them. The Court may also listen to people who have asked to speak at the hearing. You may attend the hearing at your own expense, or you may pay your own lawyer to attend, but it is not necessary.

Note: The date and time of the Final Approval Hearing are subject to change. Any change will be posted at www.UFCW7DataSettlement.com.

23. Do I have to attend to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to speak about it. As long as you mail your written objection on time, the Court will consider it.

24. May I speak at the Final Approval Hearing?

Yes, as long as you do not exclude yourself or opt out, you can (but do not have to) participate and speak for yourself in the Action about the Settlement. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you at the hearing, you must follow all of the procedures for objecting to the Settlement listed in Question 20 and specifically include a statement whether you and your counsel (if any) will appear at the Final Approval Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive Settlement benefits. You will give up rights explained in the "Opting Out from the Settlement" section of this Notice, including your right to start a lawsuit, or be part of any other lawsuit against Defendant or any of the Released Parties about the issues in the Action that are released by the Settlement Agreement.

GETTING MORE INFORMATION

26. 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 www.UFCW7DataSettlement.com. If you have questions, contact the Settlement Administrator at toll-free 1-888-261-1463 or email UFCW7DataSettlement@cptgroup.com.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE.