

Notice of Minted Data Breach Class Action Settlement

Atkinson v. Minted, Inc.

Case No. 3:20-cv-03869-VC

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

If You Were a Minted Account Holder or Provided Minted Your Personal Information, You Could Receive Payment and Free Credit Monitoring from a Class Action Settlement

KEY POINTS:

- The settlement will provide \$5 million to provide compensation and other benefits for Minted, Inc. users who were affected by a data breach that occurred on or about May 6, 2020 and resulted in the theft of users' personal identifying information.
- The Settlement includes all residents of the United States who had Minted, Inc. ("Minted") accounts, or provided Minted their name, email address, street address and/or other personal information via email, the Minted website, or other online communications, on or before June 27, 2020. If you are or were a Minted customer you may qualify for payment and/or other benefits.
- Please read this notice carefully. Your legal rights are affected whether you act or don't act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

OPTIONS	RESULT	DEADLINE
FILE A CLAIM FOR PAYMENT AND/OR CREDIT SERVICES	The only way to get payment and credit services. You must make a claim in order to receive Payment and/or Credit Services. For information about how to file a Claim, see www.MintedSettlement.com .	September 16, 2021
EXCLUDE YOURSELF	Get no payment. You can exclude yourself from the Settlement by informing the Notice and Claims Administrator that you want to "opt out" of the Settlement. This is the only option that allows you to keep your rights to bring any other lawsuit against Minted for claims related to this case. For information on how to exclude yourself, see www.MintedSettlement.com .	September 16, 2021
OBJECT OR COMMENT ON THE SETTLEMENT	Object or comment. You may write to the Court about why you like or do not like the Settlement and/or the amount of attorneys' fees, costs, expenses, or Class Representative service awards. The written notice of objection may be excused upon a showing of good cause. For information on how to object, see www.MintedSettlement.com .	September 16, 2021
GO TO A FAIRNESS HEARING	You may attend the Final Fairness Hearing where the Court may hear arguments about approval of the Settlement. You may ask to speak at the hearing on December 2, 2021. For information on the hearing, see www.MintedSettlement.com .	December 2, 2021
DO NOTHING	Get no payment. Give up rights. If you do nothing, you'll get no benefits. If the Settlement becomes final, however, you will be bound	No Deadline

by the Settlement and will give up your rights to sue Minted related to the claims in this case.
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Questions? Call 1-877-777-9145 toll free or visit www.MintedSettlement.com

These rights and options—**and the deadlines to exercise them**—are explained in this notice.

SUMMARY:

- In June 2020, plaintiffs brought a class action lawsuit against Minted following a data breach on or about May 6, 2020 in which malicious actors took personal information for millions of Minted users and customers. The information stolen included names, email addresses, hashed and salted passwords, telephone numbers, billing addresses, shipping addresses, and, for some affected customers, dates of birth. Minted notified customers of the breach on or about May 28, 2020. The lawsuit alleges that Minted failed to take reasonable steps to protect consumer data, detect the breach or promptly notify customers. Minted denies wrongdoing and the Court has not decided the merits.
- A class action Settlement has been proposed in this lawsuit. From the total settlement of \$5 million, Class Counsel will request 24% to cover the attorneys' fees and costs, approximately \$200,000 will be used for claims administration and notice to the Settlement Class, approximately \$50,000 will be used to pay the cost of credit monitoring services for the Settlement Class, and Class Counsel will seek service awards of \$5,000 each for the Class Representatives. The estimated remaining total to be distributed to the Settlement Class is approximately \$3,540,000. Under the terms of the Settlement, Minted will make certain business practice changes to improve the security of its users' personal information stored on its databases. Minted will also deposit \$5,000,000 into a Settlement Fund. The Settlement Fund will provide: (1) direct payments to consumers affected by the data breach; and (2) two years of Credit Services, including credit monitoring and identity restoration services. The Settlement Fund will also pay the costs of notice and settlement administration; court-approved attorneys' fees, costs, and expenses; and Service Awards for the named plaintiffs. In exchange, Settlement Class Members will release any and all claims they may have against Minted regarding the data breach. The release only applies to claims based on the identical factual predicate (*i.e.*, the exact same facts).
- Settlement Class Members are encouraged to submit a claim for Payment and/or Credit Services. If you already have credit monitoring services, you may still sign up for this additional protection. Payments for claims may be approximately \$43, depending on how many Settlement Class Members participate in the Settlement. **You do not need documentation of losses or out-of-pocket costs to file a claim for Payment. However, you must file a claim to receive Payment or Credit Services.**
- You are a "Settlement Class Member" if you are a resident of the United States who had a Minted account, or provided Minted your name, email address, street address and/or other personal information via email, the Minted website, or other online communications, on or before June 27, 2020.
- If approved, the proposed Settlement will resolve the litigation entitled *Atkinson et al. v. Minted, Inc.*, Case No. 3:20-cv-03869-VC, before Judge Vince Chhabria in the Northern District of California. The Court still has to decide whether to approve the settlement. Payments and benefits will be available if the Court approves the settlement and after appeals are resolved. Please be patient.
- For further details, answers to frequently asked questions, and more information, see www.MintedSettlement.com, call 1-877-777-9145, or write to Minted Settlement, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217. See Question 28 below. You may also contact Class Counsel listed below:

MOGINRUBIN LLP
Jennifer M. Oliver
600 West Broadway, Suite 3300

SCHACK LAW GROUP
Natasha N. Serino
16870 West Bernardo Drive, Suite 400

San Diego, CA 92101
Tel: (619) 687-6611
Fax: (619) 687-6610
joliver@moginrubin.com

San Diego, CA 92127
Tel: (858) 485-6535
Fax: (858) 485-0608
natashaserino@schacklawgroup.com

DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

This Settlement affects your legal rights even if you do nothing. *Please read this notice carefully.*

BASIC INFORMATION

1. Why did I get this Notice?

The Court authorized this Notice because you may have been affected by the May 2020 Minted Data Breach. You have a right to know about the proposed Settlement of a class action lawsuit against Minted, your options, and how the Settlement may affect your rights before the Court decides whether to approve the settlement. If the Court approves it and after objections and appeals are resolved, an administrator appointed by the Court will make the payments and provide the benefits that the Settlement allows.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them. This Notice also explains the ways you may participate in, or exclude yourself from, the Settlement.

The Court in charge of the case is the United States District Court for the Northern District of California, and the case is known as *Atkinson et al. v. Minted, Inc.*, Case No. 3:20-cv-03869-VC. The people who sued are called Plaintiffs and the company they sued, Minted, Inc., is called the Defendant.

2. What is this lawsuit about?

This case involves a data breach that occurred on or about May 6, 2020, in which hackers stole the personal information of millions of Minted customers. The information stolen included names, email addresses, hashed and salted passwords, telephone numbers, billing addresses, shipping addresses, and, for some affected customers, dates of birth (“Personal Information”). This Personal Information was reportedly posted for sale on the dark web. Minted notified customers of the breach on or about May 28, 2020.

The lawsuit was brought against Minted on behalf of the individuals whose Personal Information was stolen as a result of the data breach. Plaintiffs, who are customers of Minted, claim that Minted: (1) failed to adequately protect customers’ Personal Information; (2) failed to detect the breach; and (3) delayed in providing notice of the data breach. Plaintiffs also claimed that Class Members were injured as a result of the data breach. Defendant denies any wrongdoing and no court or other entity has made any judgment or determination of wrongdoing or that the law has been violated. The lawsuit seeks to recover damages for Plaintiffs and the Class Members, other relief, and attorneys’ fees and costs.

The litigation is known as *Atkinson et al. v. Minted, Inc.*, Case No. 3:20-cv-03869-VC. Judge Vincent Chhabria of the United States District Court for the Northern District of California is presiding over this class action. The current complaint filed in this litigation, which describes the specific legal claims and relief sought, is available at www.MintedSettlement.com.

3. Why is this a class action?

In a class action, one or more people called “class representatives” sue on behalf of themselves and people with

similar claims. This group is called the “Class” and the people in the class are called “Class Members.” One court resolves the issues for all class members, except for those who exclude themselves from the Class. The class representatives in this case are Melissa Atkinson and Katie Renvall.

4. Who is the defendant?

The Defendant is Minted, Inc. Minted is an online marketplace for home goods, art, and stationery, allowing independent artists to submit art that is voted on by the Minted community. The winning submissions are then sold to consumers via Minted’s online platform.

5. Why is there a Proposed Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of trial and appeals, and class members get compensation. The Class Representatives and the attorneys think the Settlement is best for everyone affected.

WHO IS AFFECTED BY THE SETTLEMENT?

To see if you are affected by the Settlement, you first have to determine if you are a Class Member.

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

To get money or benefits from the Settlement, you have to be a Class Member. You are a Class Member if:

- You are a resident of the United States; and
- You had a Minted online account, or provided Minted your name, email address, street address and/or other personal information via email, the Minted website, or other online communications, on or before June 27, 2020.

However, the following entities and individuals are **not** Class Members:

- Minted and its officers and directors;
- All Settlement Class Members who timely and validly request to opt out from the Settlement Class;
- The Judge assigned to evaluate the fairness of this settlement; or
- Any class members who provided Minted with a release of claims related to the data breach prior to the Settlement.

Even if you have not filed your own lawsuit against Minted regarding the data breach, you may obtain benefits under the Settlement because this is a class action.

RECEIPT OF THIS NOTICE DOES NOT NECESSARILY MEAN THAT YOU ARE A MEMBER OF THE CLASS OR WILL RECEIVE PROCEEDS FROM THE PROPOSED SETTLEMENT.

7. I’m still not sure if I’m included.

If you are still not sure whether you are included in the class, you can ask for free help by calling the Notice and Claims Administrator at 1-877-777-9145, or contacting Class Counsel by emailing joliver@moginrubin.com.

THE SETTLEMENT BENEFITS – WHAT YOU GET

8. What does the Proposed Settlement provide?

As part of the settlement, Minted will deposit \$5 million into a Settlement Fund to provide payments and benefits to Settlement Class Members. This includes direct payments of approximately \$43 (depending on how many people participate) and two years of credit monitoring and identity restoration services. The Settlement Fund will also be used to provide service payments to the Class Representatives, pay court-approved attorneys' fees, costs, and expenses and pay the costs of notifying the class and administering the settlement. Under the Settlement, Minted, at its sole expense, must also change its data security business practices to help protect the personal information stored on its database from another cyberattack.

Summary of Settlement Benefits:

- Payments to class members (estimated at \$43 depending on how many class members participate)
- 2 years of credit monitoring
- 2 years of identity restoration services
- Minted must make changes to its business practices regarding cybersecurity

9. What can I get from the Settlement?

Class Members who make claims can get: (1) Payment; and/or (2) Credit Services. Class Members can choose one **or both** types of benefits. In order to get any benefits, you must submit a valid Claim Form.

Payments

Class Members who make a claim for Payment receive payment of approximately \$43. The exact amount Class Members will receive depends on how many Class Members participate.

Credit Services

Class Members may also receive free Credit Services provided by Equifax for a period of two years, which will begin upon timely activation by the Class Member.

Credit Services Include:

- Credit Monitoring: Credit monitoring of Class Members' credit file for U.S. residents at all 3 major credit reporting agencies;
- Fraud Alerts
- Identity Restoration Services: Provide professional fraud resolution assistance to Class Members who experience identity theft or fraud. This includes assistance with disputing transactions, implementing fraud alerts, negotiating with banks, creditors, the IRS and other third parties, and preparing paperwork.

10. What is Minted doing to protect customers?

Under the Settlement, Minted, at its sole expense, must also change its data security practices to help protect customers' personal information stored on its database. This includes providing annual security awareness training for its employees, implementing a policy regarding the retention of personal information of customers, enhancing password protection by requiring more complex account passwords, implementing security measures, filtering certain traffic to protect against attacks, executing cybersecurity audits, and maintaining a written information security program for its employees.

11. What am I giving up?

Unless you exclude yourself from the settlement, you are staying in the Class and that means you can't sue, continue to sue, or be part of any other lawsuit against Minted about the issues in *this* case. It also means that all of the Court's

decisions will apply to you and legally bind you. If you sign the Claim Form, you will agree to the “Plaintiff’s Release” described in Sections 1.20 and 10.1 of the Settlement Agreement. You will be releasing Minted and all related people as described in Sections 1.19 and 1.21 of the Settlement Agreement. The Settlement Agreement is available at www.MintedSettlement.com.

The Settlement Agreement, which is part of the Court documents in this case, describes the legal claims that you give up if you get Settlement benefits. Please read it carefully. If you have any questions, you may contact one of the law firms listed on page 2 for free, or you can talk to your own lawyer.

HOW TO FILE A CLAIM

12. How do I file a claim?

To obtain a Payment and/or Credit Services, you must submit a valid Claim Form to the Notice and Claims Administrator by September 16, 2021. There are two options to file your claim:

1. **File Online:** You may fill out and submit a Claim Form online at www.MintedSettlement.com; or
2. **File by Mail:** Alternatively, you may ask the Notice and Claims Administrator to mail a Claim Form to you by calling 1-877-777-9145 or emailing info@MintedSettlement.com. Complete your Claim Form and mail it (including postage) to: Minted Settlement, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217.

The deadline to file your Claim Form is September 16, 2021. This is the last day to file online or postmark deadline for mailed claims. **You do not need documentation of losses to submit a Claim Form and the process is simple.**

13. How will I receive my benefits?

To be eligible for payment, Claim Forms **must be submitted** electronically or postmarked no later than September 16, 2021.

14. When will I receive my benefits?

The Court will hold a hearing on December 2, 2021 to decide whether to approve the Settlement. If Judge Chhabria approves the Settlement, there may be appeals. Resolving them can take time, perhaps more than a year. If and when the Settlement becomes final, the Notice and Claims Administrator will start issuing benefits.

Digital payments will be administered by the Notice and Claims Administrator after the Settlement becomes final in accordance with your selection on the Claim Form. For Class Members who elect to receive Payment in the form of a check, checks will be mailed by the Notice and Claims Administrator to the mailing address that you provide. If you make a valid claim for Credit Services, the Notice and Claims Administrator will send you information on how to activate your credit monitoring. The Notice and Claims Administrator will provide you with an activation code which you will use at the Equifax website to activate your Credit Services.

15. What happens if my contact information changes after I submit a claim?

If your mailing address or email address changes after you submit a claim form, it is your responsibility to inform the Notice and Claims Administrator of your updated information. You may do so by contacting the Notice and Claims Administrator using the contact information Minted Settlement, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217.

16. What happens if some of the money from this Settlement is not claimed?

Any money left in the Settlement Fund will be used to increase Payments to Class Members until as much of the Settlement Fund is depleted as possible. None of the money in the \$5 million Settlement Fund will be refunded to Minted if the Settlement becomes final.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to receive benefits from the Settlement, and you want to keep your right, if any, to sue Minted on your own about the legal issues in this case, then you must take steps to exclude yourself from the Settlement. This is called “opting out” of the class. When you opt out, you will not receive any benefits of the Settlement, and you will not be bound by its terms.

17. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement, you must send a signed letter by mail stating your intent to be excluded to the Notice and Claims Administrator. The letter should include: (1) your name; (2) a statement that you want to be excluded; and (3) your signature. The letter must be postmarked no later than September 16, 2021, to:

Minted Settlement
c/o A.B. Data, Ltd.
P.O. Box 170500
Milwaukee, WI 53217

You cannot exclude yourself by mailing a notification to any other location, or after the deadline of September 16, 2021.

You cannot exclude yourself by telephone or by email. Your exclusion letter must be signed by you personally, and not your lawyer or anyone else acting on your behalf. If you ask to be excluded, you will not get any Settlement payment or benefits and you cannot object to the Settlement. You may be able to sue (or continue to sue) Minted in the future.

18. Can I sue the Settling Defendant later?

Unless you opt out, you give up the right to sue Minted for the claims the Settlement resolves if the Settlement is approved. You must exclude yourself if you want to sue Minted later.

OBJECTING TO THE SETTLEMENT

You can tell the court that you don't agree with the Settlement or some part of it.

19. How do I tell the Court that I don't like the Proposed Settlement or Plan of Distribution?

If you're a Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. You can't ask the Court to order a larger settlement, but you can voice your concerns. The court can only approve or deny the Settlement. If the Court denies approval, no Settlement Payments or benefits will be given out and the lawsuit will continue. If that is what you want to happen, you must object.

To object, you must send a written letter that includes, among other requirements, the following:

- (1) Your full name, address, telephone number, email address (if any).
- (2) A statement that you object to the Settlement, the reasons for your objection and any legal support.
- (3) Proof of your membership in the Class, such as a copy of Notice or a copy of the original notice Minted sent customers regarding the data breach.
- (4) The identity of all counsel representing you, including counsel who will appear at the Final Fairness Hearing.
- (5) A list of all persons who will be called to testify at the Final Fairness Hearing in support of the objection.
- (6) Your signature and the signature of your attorney (along with documentation of such representation).
- (7) A list, by case name, court and docket number, of all other cases in which you have filed an objection to any proposed class action settlement in the last 3 years.
- (8) A list, by case name, court and docket number, of all other cases in which your attorney (on behalf of any person) has filed an objection to any proposed class action settlement in the last 3 years.
- (9) A list, by case name, court and docket number, of all other cases in which you have been a named plaintiff in any class action or served as a lead plaintiff or class representative.

The Proposed Settlement, which is part of the Court documents in this case, provides a complete list of information to include in your written notice of objection. The written notice of objection may be excused upon a showing of good cause. **Moreover, the Court will only require substantial compliance with the requirements for submitting an objection.**

Your objection must identify this case and case number and must be filed with the Court at the following address, **postmarked by September 16, 2021.**

Office of the Clerk
 United States District Court for the Northern District of California
 450 Golden Gate Avenue
 San Francisco, CA 94102-3489

You must also mail copies of the objection to the following attorneys, **postmarked by September 16, 2021**

Jennifer M. Oliver
 MOGINRUBIN LLP
 600 W. Broadway, Suite 3300
 San Diego, CA 92101

Ian C. Ballon
 GREENBERG TRAURIG LLP
 1900 University Ave, 5th Floor
 East Palo Alto, CA 94303

20. What's the difference between objecting and excluding?

The difference between objecting and excluding is that objecting is simply telling the Court that you don't like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

DISTRIBUTION OF THE SETTLEMENT PROCEEDS

21. How will the funds from the settlement be distributed?

Subject to the Court's approval, Class Counsel may use the Settlement Fund to pay: (a) the cost of providing Credit Services; (b) to distribute Payments to Class Members; (c) the costs of giving notice and administration of the Settlement Fund; (d) to pay for Class Representatives' service awards; and (e) to pay Class Counsel's attorneys' fees, costs, and expenses.

THE COURT'S FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you don't have to.

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

The Court will hold a Final Fairness Hearing at 2 p.m. on December 2, 2021, in Courtroom 4 at the United States District Court for the Northern District of California located at: 450 Golden Gate Avenue, San Francisco, CA 94102. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the Proposed Settlement. We do not know how long these decisions will take.

The Court may change the time and date of the Fairness Hearing *without further notice to the class*. Notice of any change will be posted at the courthouse or on the Court's PACER website.

23. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. You do not have to attend, but you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection by the deadline, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

24. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter stating the following:

- "Notice of Intention to Appear in *Atkinson et al. v. Minted*."
- Your name, address, telephone number, and signature.
- The position you will take on the Proposed Settlement and your reasons.
- Proof of your membership in the Class.

Your Notice of Intention to Appear must identify this case and the case number and must be filed with the Court at the following address, **postmarked by September 16, 2021**:

Office of the Clerk
United States District Court for the Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102-3489

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 19 above.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you do nothing, you'll get no benefits from this Settlement. But, unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Minted about the legal issues in this case, ever again.

THE LAWYERS REPRESENTING YOU AS A CLASS MEMBER

26. Do I have a lawyer in this case?

Jennifer M. Oliver of MoginRubin LLP and Natasha N. Serino of Schack Law Group represent the Class. Together, these lawyers are called Class Counsel. 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.

27. How will the lawyers be paid?

You do not have to pay Class Counsel. To date, Class Counsel have not requested or been paid any attorneys' fees. As part of the Settlement, Class Counsel will ask the Court for payment of attorneys' fees from the Settlement Fund of up to \$1,200,000 and a payment of \$5,000 to each Class Representative. Additionally, Class Counsel will seek reimbursement of costs and expenses associated with litigation. The Court may award less than these amounts. Class Members shall have no obligation to pay any fees or expenses of Class Counsel. No payment of attorneys' fees or reimbursement of expenses shall be made in favor of Class Counsel, absent an order of the Court. The costs of providing this notice and administering the Settlement are being paid from the Settlement Fund.

GETTING MORE INFORMATION

28. How do I get more information?

This Notice summarizes the litigation and the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement, see other important documents and learn more about the litigation and Settlement by visiting www.MintedSettlement.com, calling 1-877-777-9145, or writing to Minted Settlement, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217.

You may also contact Class Counsel at the following addresses:

Jennifer M. Oliver
MOGINRUBIN LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
joliver@moginrubin.com

Natasha N. Serino
SCHACK LAW GROUP
16870 West Bernardo Drive, Suite 400
San Diego, CA 92127
natashaserino@schacklawgroup.com

Do not contact the Judge or the Clerk of Court regarding this settlement.

29. How can I access case documents?

Many of the key documents regarding this case can be found on the Settlement website at www.MintedSettlement.com. In addition, you can find the case documents on the case docket at PACER. All of the case documents that have been filed publicly in this case are also available online through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>. This case is called *Atkinson v. Minted, Inc.*, and its case number is 3:20-cv-03869-VC. You may obtain case documents by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Jose Division, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. You can also get a copy of these and other documents by contacting Class Counsel at joliver@moginrubin.com.

DATED: June 7, 2021

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MINTED DATA BREACH
NOTICE AND CLAIMS ADMINISTRATOR
c/o A.B. DATA, LTD.
PO BOX []
MILWAUKEE, WI 53217-8091

COURT-APPROVED NOTICE REGARDING
MINTED DATA BREACH CLASS ACTION

DATED MATERIAL—OPEN IMMEDIATELY