

## **NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

*Aaron Umberger and Tracy Bruner et al. v. Kerber, Eck & Braeckel LLP,*  
Case No. 2024LA000198, Circuit Court of Sangamon County, Illinois,  
(Seventh Judicial Circuit)

*Jessica Kurtz v. Kerber, Eck & Braeckel LLP,*  
Case No. 2024LA000264, Circuit Court of Sangamon County, Illinois  
(Seventh Judicial Circuit)

### **IF YOUR PERSONAL INFORMATION WAS IMPACTED BY A CYBERSECURITY INCIDENT THAT KERBER, ECK & BRAECKEL LLP EXPERIENCED IN OR AROUND FEBRUARY 2023, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS**

*A state court authorized this Notice. You are not being sued.*

*This is not a solicitation from a lawyer.*

- A \$1,400,000 Settlement has been reached with Kerber, Eck & Braeckel LLP (“KEB” or “Defendant”) in class action lawsuits about a cybersecurity incident that occurred in or around February 2023
- The lawsuits are captioned *Aaron Umberger and Tracy Bruner et al. v. Kerber, Eck & Braeckel LLP*, Case No. 2024LA000198. (Circuit Court of Sangamon County Illinois, Seventh Judicial Circuit ) and *Jessica Kurtz v. Kerber, Eck & Braeckel LLP*, Case No. 2024LA000264 (Circuit Court of Sangamon County, Illinois Seventh Judicial Circuit). KEB denies the allegations and all liability or wrongdoing with respect to any and all facts and claims alleged in the lawsuit but has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is any individual residing in the United States whose Private Information was identified as being actually or potentially accessed, compromised or impacted in connection with the Data Incident discovered by KEB in February 2023.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive cash and other benefits from this Settlement is by submitting a valid and timely Claim Form.  You can submit your Claim Form online at <a href="http://www.kebdatasettlement.com">www.kebdatasettlement.com</a> or 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.	<b>November 25, 2025</b>

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>OPT OUT OF THE SETTLEMENT</b>	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 elect to retain your own legal counsel at your own expense.	<b>October 27, 2025</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	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 benefits.	<b>October 27, 2025</b>
<b>DO NOTHING</b>	Unless you opt out of the settlement, you are part of the Settlement. If you do nothing, you will not get a payment 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.

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## BASIC INFORMATION

### 1. Why was this Notice issued?

A state 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 lawsuits are captioned Aaron Umberger and *Tracy Bruner et al. v. Kerber, Eck & Braeckel LLP*, Case No. 2024LA000198. (Circuit Court of Sangamon County Illinois, Seventh Judicial Circuit) and *Jessica Kurtz v. Kerber, Eck & Braeckel LLP*, Case No. 2024LA000264 (Circuit Court of Sangamon County, Illinois Seventh Judicial Circuit). The people that filed these lawsuits are called the “Plaintiffs” and the company they sued, KEB, is called the “Defendant.”

## 2. What is this lawsuit about?

This lawsuit alleges that personal information was impacted by the cybersecurity incident that affected KEB in or around February 2023 (“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 “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “class” or “class members.” One court resolves the lawsuit for all settlement class members, except for those who opt out from a settlement. In this Settlement, the Class Representatives are Aaron Umberger; Tracy Bruner, and Jessica Kurtz.

## 4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. The Defendant denies all claims and contends that it has not violated any laws. Plaintiffs and the Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to receive payments. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

## WHO IS IN THE SETTLEMENT?

### 5. Who is included in the Settlement?

The Settlement Class consists of all individuals residing in the United States whose Private Information was identified as being actually or potentially accessed, compromised or impacted in connection with the in the Data Incident discovered by KEB in February 2023.

### 6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) the judges presiding over this Litigation, and members of their direct families; (ii) the Defendant, their subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or their parents have a controlling interest, and their current or former officers and directors; and (iii) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

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

Email: [kebdatasettlement@rg2claims.com](mailto:kebdatasettlement@rg2claims.com)  
*KEB Data Incident Settlement,*  
c/o RG/2 Claims Administration,  
P.O. Box 59479  
Philadelphia, PA 19102-9479

You may also view the Settlement Agreement and Release (“Settlement Agreement”) at [www.kebdatasettlement.com](http://www.kebdatasettlement.com).

## **THE SETTLEMENT BENEFITS**

### **7. What does the Settlement provide?**

Under the Settlement, KEB will fund a non-reversionary \$1,400,000 Settlement Fund to pay all valid and timely claims for Credit Monitoring, Unreimbursed Economic Losses, and Pro Rata Cash Payments, as well as notice and administration costs, attorneys’ fees and expenses, and service awards, subject to Court approval.

### **8. How much will my payment be?**

Payments will vary - Settlement Class Members may submit a claim form for any or all of the following benefits: (1) 2 years of credit monitoring; (2) Unreimbursed Economic Losses – up to a total of \$10,000 per claimant; and (3) a Pro Rata Cash Payment estimated to be \$50.

**Credit Monitoring Services.** All Settlement Class Members shall have the ability to make a claim for 2 years of Three-Bureau Credit Monitoring Services by choosing this benefit on this Claim Form.

**Unreimbursed Economic Losses** up to a total of \$10,000 per claimant, upon submission of a valid claim with supporting documentation for unreimbursed economic losses incurred as a result of or fairly traceable to the Data Incident, including, without limitation, unreimbursed losses relating to fraud or identity theft; professional fees including attorneys’ fees, accountants’ fees, and fees for credit repair services; costs associated with freezing or unfreezing credit with any credit reporting agency; credit monitoring costs that were incurred on or after the Data Incident through the date of claim submission; and miscellaneous expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges.

**Pro Rata Cash Payment** which is a pro rata share of the Net Settlement Fund, less all valid claims for Unreimbursed Economic Losses. This is estimated to be at least \$50.

### **9. 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 “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at [www.kebdatasettlement.com](http://www.kebdatasettlement.com).

## HOW TO GET A PAYMENT - MAKING A CLAIM

### 10. How do I submit a claim and get a cash payment?

You may file a claim if you are an individual who resides in the United States who received notice of the Data Incident from KEB.

Claim Forms may be submitted online at [www.kebdatasettlement.com](http://www.kebdatasettlement.com) or printed from the website and mailed to the Settlement Administrator at:

*KEB Data Incident Settlement,*  
c/o RG/2 Claims Administration,  
P.O. Box 59479  
Philadelphia, PA 19102-9479

You may also contact the Settlement Administrator to request a Claim Form by telephone 1-866-742-4955, by email to [kebdatasettlement@rg2claims.com](mailto:kebdatasettlement@rg2claims.com) or by U.S. mail at the address above.

### 11. What is the deadline for submitting a claim?

If you submit a claim by U.S. mail, the completed and signed Claim Form must be postmarked by **November 25, 2025**. If submitting a Claim Form online, you must do so by **November 25, 2025**.

### 12. When will I get my payment?

The Court is scheduled to hold a final approval hearing on January 7, 2026 at 2:30 pm CT via Zoom, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class.

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 payments will be distributed as soon as possible, if and when the Court grants final approval to the Settlement and after any appeals are resolved.

## THE LAWYERS REPRESENTING YOU

### 13. Do I have a lawyer in the case?

Yes, the Court appointed Cassandra P. Miller of Strauss Borrelli PLLC; Tyler J. Bean of Siri Glimstad LLP; and Gary Klinger of Milberg Coleman Bryson Phillips Grossman to represent you and other members of the Settlement Class. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval). If you want to be represented by your own lawyer, you may hire one at your own expense.

## 14. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

## 15. How will the lawyers be paid?

Settlement Class Counsel will file a motion for an award of attorneys' fees and litigation costs and expenses to be paid from the Settlement Fund. KEB has agreed not to oppose Settlement Class Counsel's request for an award of attorneys' fees and litigation costs and expenses not to exceed \$486,666.67.

Settlement Class Counsel will also seek a service award payment for the Class Representatives in recognition for their contributions to this Action. KEB has agreed not to oppose Settlement Class Counsel's request for service awards not to exceed \$5,000.00 for each of the three Class Representatives (\$15,000.00 total).

## EXCLUDING YOURSELF FROM THE SETTLEMENT

## 16. 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, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The deadline for requesting exclusion from the Settlement is **October 27, 2025**.

For an Opt-Out Request to be valid, it must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature (or the original signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a power of attorney to act on your behalf); (c) clearly manifest your intent to be excluded from the Settlement Class, to be excluded from the Settlement, to not participate in the Settlement, and/or to waive all rights to the benefits of the Settlement; and (d) be postmarked no later than the final date of the Opt-Out Period.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **October 27, 2025**.

*KEB Data Incident Settlement*  
ATTN: Exclusion Request  
c/o RG/2 Claims Administration  
P.O. Box 59479  
Philadelphia, PA 19102-9479

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 a payment or any other benefits under the Settlement if you exclude yourself. You may only exclude yourself – not any other person.

## **COMMENTING ON OR OBJECTING TO THE SETTLEMENT**

### **17. How do I tell the Court if I like or do not like the Settlement?**

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must: (i) state the objecting Settlement Class Member's full name, current address, telephone number, and email address (if any); (ii) contain the objecting Settlement Class Member's original signature; (iii) set forth information identifying the objector as a Settlement Class Member, including proof that the objector is within the Settlement Class (e.g., copy of the Notice or copy of original notice of the Data Incident); (iv) set forth a statement of all grounds for the objection, including any legal support for the objection that the objector believes applicable; (v) identify all counsel representing the objector; (vi) state whether the objector and/or his or her counsel will appear at the Final Approval Hearing, and; (vii) contain the signature of the objector's duly authorized attorney or other duly authorized representative (if any), along with documentation setting forth such representation.

Any Settlement Class Member who does not file a timely and adequate objection in accordance with the above paragraph waives the right to object or to be heard at the Final Approval Hearing and shall be forever barred from making any objection to the Settlement and shall be bound by the terms of the Agreement and by all proceedings, orders, and judgments in the Action.

Objections must be filed with the Court no later than **October 27, 2025**.

Clerk of Court  
7<sup>th</sup> Judicial Circuit Court  
200 South 9<sup>th</sup> Street  
Springfield, IL 62701

### **18. 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**

### **19. When is the Court's Final Approval Hearing?**

The Court is scheduled to hold a final approval hearing on January 7, 2026 at 2:20 pm CT via Zoom; Meeting ID: 302 782 5345 and Password: 981928, at 7<sup>th</sup> Judicial Circuit Court, 200 South 9<sup>th</sup> Street, Springfield, IL 62701, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a service award payment to each Class Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to

Speak at the hearing at your own cost. The date and time of this hearing may change without further notice. Please check [www.kebdatasettlement.com](http://www.kebdatasettlement.com) for updates.

## 20. Do I have to come to the Final Approval Hearing?

No. Settlement 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 and in accordance with the requirements above, 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 and meets the requirements above.

### IF I DO NOTHING

## 21. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights explained in **Question 9**, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will not receive a payment from this Settlement.

### GETTING MORE INFORMATION

## 22. 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.kebdatasettlement.com](http://www.kebdatasettlement.com).

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

Email: [kebdatasettlement@rg2claims.com](mailto:kebdatasettlement@rg2claims.com)

Toll-Free: 1-866-742-4955

Mail: KEB Settlement Administrator, c/o RG/2 Claims Administration, P.O. Box 59479, Philadelphia, PA 19102-9479

Publicly filed documents can also be obtained by visiting the office of the Circuit Court of Sangamon County, Illinois or by reviewing the Court's online docket.

**PLEASE DO NOT CONTACT THE COURT OR KEB**