

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Bakale v. Universal Lenders, LLC*

Case No. 2025LA00000214

Circuit Court for the Nineteenth Judicial District, Lake County, Illinois

**IF YOUR PRIVATE INFORMATION WAS COMPROMISED IN THE NOVEMBER 2024 UNIVERSAL LENDERS, LLC, DATA BREACH, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

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

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with Universal Lenders, LLC (“UL” or “Defendant”) in a class action lawsuit. This case is about the targeted cyberattack on UL's computer systems that occurred in November 2024 (the “Data Breach”). Certain files that contained private information were accessed. These files may have contained personal information such as names; Social Security numbers; financial account numbers; and driver’s license numbers.
- The lawsuit is called *Bakale v. Universal Lenders, LLC*, Case No. 2025LA00000214. It is pending in the Circuit Court for the Nineteenth Judicial District, Lake County, Illinois (the “Litigation”).
- UL denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- UL's records indicate that you are a Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from UL.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>SUBMIT A CLAIM</b>	<p>The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.UIDataSettlement.com">www.UIDataSettlement.com</a>. If you prefer, you can 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.</p>	<b>April 13, 2026</b>
<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 Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	<b>March 14, 2026</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 Settlement benefits.	<b>March 14, 2026</b>
<b>DO NOTHING</b>	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits 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?

The Circuit Court for the Nineteenth Judicial District, Lake County, Illinois, authorized this Notice. 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 lawsuit is called *Bakale v. Universal Lenders, LLC*, Case No. 2025LA00000214. It is pending in the Circuit Court for the Nineteenth Judicial District, Lake County, Illinois. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Universal Lenders, LLC, is called the “Defendant.”

#### 2. What is this lawsuit about?

This lawsuit alleges that during the November 2024 targeted cyberattack on UL's computer systems, certain files that contained private information were accessed. These files may have contained personal information such as names; Social Security numbers; financial account numbers; and driver’s license numbers.

#### 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 called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representatives are Matthew Bakale, Samantha Krulicki, Akeem Shannon, and Mary Wilson. Everyone included in this Action are the Class Members.

#### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiffs and their attorney think the Settlement is best for all Class Members.

## Who is in the Settlement?

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

The court has defined the Class this way: “All individuals to whom Defendant mailed notices that their Private Information was potentially compromised in the Data Breach discovered in November 2024.”

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

Yes. Excluded from the Class are: (1) UL and its officers, directors, and related companies; (2) anyone who validly excludes themselves from the Settlement; (3) governmental entities; (4) attorneys for the parties; (5) the Judge in this case, and the Judge’s family and staff; and (6) anyone who perpetrated the Data Breach.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@ULDataSettlement.com](mailto:info@ULDataSettlement.com)
- Call toll free, 24/7: 1-833-647-8961
- By mail: UL Data Breach Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at [www.ULDataSettlement.com](http://www.ULDataSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

All Class Members may claim three years of **Credit Monitoring** services and **one** of two **cash payment** options:

**OPTION 1: Expense Reimbursement.**

If you have documented out-of-pocket expenses, you can get back up \$2,500.00.

OR

**OPTION 2: Alternative Cash Payment**

Receive a one-time \$50.00 cash payment.

The benefits are explained in more detail below.

**Credit Monitoring Services.** All Class Members are eligible to enroll in three years of single bureau Credit Monitoring Services. This benefit comes with \$1 million in identity theft insurance, and includes:

- real time monitoring of your credit file
- dark web scanning
- comprehensive public records monitoring

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

**Expense Reimbursement.** If you incurred actual, documented out-of-pocket expenses due to the Data Breach, you can get back up to **\$2,500.00**.

This benefit covers the following examples unreimbursed out-of-pocket expenses:

- (i) costs to obtain credit reports;
- (ii) fees relating to a credit freeze;
- (iii) card replacement fees;
- (iv) late fees;
- (v) over-limit fees;
- (vi) interest and fees on payday loans taken as a result of the Data Breach;
- (vii) bank or credit card fees;
- (viii) postage, mileage, and other incidental expenses; and
- (ix) costs associated with up to one year of credit monitoring or identity theft insurance (must have been purchased between June 3, 2024, and August 29, 2025)

You need to send proof, like receipts, to show how much you spent or lost. You can also send notes or papers you made yourself to explain or support other proof, but those notes or papers alone are not enough to make a valid claim. Your proof or notes should show that your expenses were because of the Data Incident.

You cannot claim a payment for expenses that have already been reimbursed by a third party.

**Alternative Cash Payment.** *Instead of Expense Reimbursement*, you may claim a one-time **\$50.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@ULDataSettlement.com](mailto:info@ULDataSettlement.com)
- Call toll free, 24/7: 1-833-647-8961
- By mail: UL Data Breach Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

## 8. What claims am I releasing if I stay in the Class?

If you stay in the class, you won't be able to be part of any other lawsuit against UL about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section 6) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.ULDataSettlement.com](http://www.ULDataSettlement.com).

## Submitting a Claim Form for a Settlement Payment

### 9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at [www.ULDataSettlement.com](http://www.ULDataSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

UL Data Breach Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-647-8961, by email [info@ULDataSettlement.com](mailto:info@ULDataSettlement.com), or by U.S. mail at the address above.

### 10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **April 13, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **April 13, 2026**.

### 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **April 21, 2026 (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

## The Lawyers Representing You

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

Yes, the Court has appointed attorney Gary Klinger, Esq. of Milberg Coleman Bryson Phillips Grossman, LLC, to represent you and other Class Members (“Class Counsel”).

### 13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

### 14. How will Class Counsel be paid?

Class Counsel will ask the court to approve \$200,000.00 as reasonable attorney's fees and costs of litigation. This amount will be paid by UL.

Class Counsel will also ask for Service Award payments of \$1,500.00 for each of the Class Representatives. Service Award payments will also be paid by UL.

## Excluding Yourself from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue UL on your own about the legal issues in this case.

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 any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **March 14, 2026**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Litigation: *Bakale v. Universal Lenders, LLC*, Case No. 2025LA00000214, pending in the Circuit Court for the Nineteenth Judicial District, Lake County, Illinois;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

UL Data Breach Settlement  
ATTN: Exclusion Request  
P.O. Box 25226  
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **March 14, 2026**.

## Commenting on or Objecting to the Settlement

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

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Litigation: *Bakale v. Universal Lenders, LLC*, Case No. 2025LA00000214, pending in the Circuit Court for the Nineteenth Judicial District, Lake County, Illinois;
- (2) your full name, mailing address, telephone number, and email address;

- (3) information that proves that you are a Class Member (such as a notice you have received, or a statement explaining why you believe you are a Class Member);
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (6) whether you and/or your attorney will appear at the Final Approval Hearing;
- (7) your signature (or, if you have hired your own lawyer, your lawyer’s signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **March 14, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of the Court Lake County Courthouse 18 N County Street Waukegan, IL 60085	UL Data Breach Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958
<b>Class Counsel</b>	<b>Counsel for Defendants</b>
Gary M. Klinger <b>Milberg Coleman Bryson Phillips Grossman PLLC</b> 227 W. Monroe Street, Suite 2100 Chicago, IL 60606	Jon P. Kardassakis <b>Lewis Brisbois</b> 633 W. 5th Street, Suite 4000 Los Angeles, CA 90071

## 17. 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

### 18. When is the Court’s Final Approval Hearing?

The Court will hold a final approval on **April 21, 2026 at 9:00 a.m. Central Time**, in Courtroom C-204 of the Circuit Court for the Nineteenth Judicial District, Lake County, Illinois, at 18 N County Street, Waukegan, IL 60085.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award Service Award payments to the Class Representatives. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check [www.UIDataSettlement.com](http://www.UIDataSettlement.com) for updates.

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

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## **If I Do Nothing**

### **20. What happens if I do nothing at all?**

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## **Getting More Information**

### **21. How do I get more information?**

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.UIDataSettlement.com](http://www.UIDataSettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@UIDataSettlement.com](mailto:info@UIDataSettlement.com)
- Call toll free, 24/7: 1-833-647-8961
- By mail: UL Data Breach Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court at 18 N County Street, Waukegan, IL 60085.

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**