

**IN THE COURT OF COMMON PLEAS
OF ALLEGHENY COUNTY, PENNSYLVANIA**

If you are a current or former employee of a UPMC entity and your data was compromised in the 2014 data breach, you could get a payment from a class action settlement.

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

Your legal rights are affected whether you act or don't act. Read this Notice carefully.

- A settlement has been proposed to resolve a lawsuit against UPMC d/b/a the University of Pittsburgh Medical Center and UPMC McKeesport (collectively, "UPMC") brought by employees impacted by a third-party criminal cyberattack, which was announced by UPMC in February 2014 and which potentially compromised data relating to roughly 66,000 current and former employees (the "Data Breach"). The lawsuit, referred to as *Dittman et al. v. UPMC et al.*, Case No. GD 14-003285 (Allegheny Cty. Ct. Com. Pl.), asserts claims on behalf of a class of current and former UPMC employees. The employees allege that UPMC was negligent in its handling of sensitive employee data. UPMC denies these allegations, denies any wrongdoing, and denies that it would be found liable in any amount to employees.
- Under the Settlement, UPMC will pay \$1,679,000 into an escrow account, out of which the Settlement Administrator will make payments to Settlement Class Members. The methods that will be used to distribute these funds to Settlement Class Members are described in detail in this Notice.
- In addition, UPMC will pay up to \$200,000 to cover the costs of notice and settlement administration. Further, if approved by the Court, UPMC will pay up to \$750,000 in fees, costs, and expenses to attorneys for the Settlement Class, and service awards of \$3,000 to each of the seven Class Representatives.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM AND DOCUMENTATION FOR REIMBURSEMENT OF FRAUD-RELATED LOSSES OR FRAUD-RELATED INCONVENIENCES	If you experienced fraud or identity theft related to the 2014 UPMC Data Breach, you may file a Claim Form and seek reimbursement of out-of-pocket losses up to a maximum of \$5,000, and up to \$250 for fraud-related inconveniences you experienced. You must provide documentation to support your claims. The amount you receive will be subject to pro rata reduction if the value of claims made exceeds available funds.
DO NOTHING, AND RECEIVE AUTOMATIC PAYMENT	If you do nothing, you will receive a cash payment from the Unclaimed Distributions Fund in an amount likely to be between \$10 and \$20. You will also forfeit your right to sue or bring any claim against UPMC and/or Defendants' Released Persons related to the 2014 Data Breach.
EXCLUDE YOURSELF	If you ask to be excluded, you will not receive a cash payment, but you may be able to file your own lawsuit against UPMC for the same claims. This is the only option that leaves you the right to file your own lawsuit against UPMC and/or Defendants' Released Persons for the claims that are being resolved by the Settlement. In order to be effective, a request to be excluded from the Settlement must include all information required by the Settlement.
OBJECT	You can remain in the Settlement Class and file an objection telling the Court why you believe the Settlement should not be approved. If your objections are overruled, you will be bound by the Settlement.

- 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. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.

WHAT THIS NOTICE CONTAINS

Basic Information	Page 3
1. Why did I get this Notice package?	
2. What is this lawsuit about?	
3. Why is this a class action?	
4. Why is there a settlement?	
Who Is Part of the Settlement	Page 3
5. How do I know if I am part of the Settlement?	
6. Are there exceptions to being included?	
7. I am still not sure I am included.	
The Settlement Benefits	Page 4
8. What does the Settlement provide?	
9. How much will my payment be?	
How to Get a Payment – Submitting a Claim Form	Page 5
10. How can I get a payment?	
11. When would I get my payment?	
12. What am I giving up to get a payment or remain in the Settlement Class?	
Excluding Yourself from the Settlement	Page 6
13. How can I opt out of the Settlement?	
14. If I don't opt out, can I sue UPMC for the same thing later?	
15. If I exclude myself, can I get money from this Settlement?	
The Lawyers and Individuals Representing You	Page 7
16. Do I have a lawyer in the case?	
17. How will the lawyers and individuals representing the class be paid?	
Objecting to the Settlement	Page 7
18. How do I tell the Court that I do not like the Settlement?	
19. What is the difference between objecting and excluding/opting out?	
The Court's Final Approval Hearing	Page 8
20. When and where will the Court decide whether to approve the Settlement?	
21. Do I have to attend the hearing?	
If You Do Nothing	Page 9
22. What happens if I do nothing at all?	
Getting More Information	Page 9
23. How do I get more information?	

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BASIC INFORMATION

1. Why did I get this Notice package?

You are a current or former employee of a UPMC entity whose personal information may have been accessed or exposed during a breach of UPMC's computer systems, first publicly announced in early 2014. A group of similarly situated individuals brought a proposed class action lawsuit against UPMC in 2014, alleging UPMC was negligent due to its data security practices. UPMC denied the allegations and denied that it would be found liable. The parties have now reached a proposed settlement of the lawsuit.

The Court authorized this Notice because you have a right to know about your rights under the proposed class action Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the cash payments that the Settlement allows, and the pending legal claims against UPMC will be released and dismissed.

This package explains the lawsuit, the Settlement, your rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Court of Common Pleas of Allegheny County, Pennsylvania, and the case is known as *Dittman et al. v. UPMC et al.*, Case No. GD 14-003285 (Allegheny Cty. Ct. Com. Pl.). The current and former employees who sued are called "Plaintiffs," and the entities they sued, UPMC d/b/a The University of Pittsburgh Medical Center and UPMC McKeesport, are the "Defendants."

2. What is this lawsuit about?

The *Dittman v. UPMC* lawsuit is related to the 2014 Data Breach and asserts claims against UPMC for alleged negligent data security practices. The employee Plaintiffs seek to recover damages in the lawsuit for incidents of identity theft, tax refund fraud, inconveniences, and other costs allegedly incurred as a result of the Data Breach. UPMC denies the allegations, denies any wrongdoing, and denies that it is liable in any amount to Plaintiffs. The Court has not decided whether UPMC has any legal liability.

3. Why is this a class action?

In a class action, one or more individuals called "Class Representatives" sue on behalf of themselves and other individuals with similar claims. All of these entities together are the "Class" or "Class Members." One court resolves the issues for all class members, except for those who exclude themselves from the Settlement Class.

4. Why is there a settlement?

The Court has not decided in favor of Plaintiffs or UPMC. Instead, both sides agreed to the Settlement. The Settlement is not an admission that UPMC did something wrong, but rather a compromise to end the lawsuit. By agreeing to settle, both sides avoid the costs, risks, and uncertainties of a trial and related appeals, while providing benefits to members of the Settlement Class. The Settlement Class Representatives and the attorneys for the Settlement Class think the Settlement is best for all Class Members.

WHO IS PART OF THE SETTLEMENT

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

You are a member of the Settlement Class and affected by the Settlement if:

- You are or were employed by a UPMC entity; and
- Your personally identifying information was contained in or on the UPMC computer system and was potentially accessed, stolen, or compromised as a result of the data breach first announced by UPMC in February 2014.

Specifically *excluded* from the Settlement Class are the Court—and any immediate family members of the Court—and individuals who timely and validly request exclusion from the Settlement Class.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.

6. Are there exceptions to being included?

If you timely exclude yourself from the Settlement, you are no longer part of the Settlement Class and will no longer be eligible to receive any of the Settlement benefits. This process of excluding yourself is also referred to as “opting out” of the Settlement.

7. I am still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call 1-855-535-1794 or visit www.UPMCDittmanSettlement.com for more information.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

Under the Settlement, UPMC will pay \$1,679,000 (one million, six hundred and seventy-nine thousand dollars) into a Settlement Fund. One half of the Settlement Fund (\$839,500) will be initially reserved in a “Documented Fraud Fund” to pay claims to Settlement Class Members who submit claims and documentation establishing that they suffered a Documented Out-of-Pocket Fraud Loss or Documented Fraud-Related Inconvenience. (Those terms are described in more detail in the section below). The maximum claim amounts are \$5,000 for Documented Out-of-Pocket Fraud Losses and \$250 for Documented Fraud-Related Inconvenience. These amounts may be reduced pro rata if the total value of claims made exceed available funds, and the Documented Fraud-Related Inconvenience claims will not be paid at all if the Documented Fraud Fund is insufficient to cover the value of all approved Documented Out-of-Pocket Losses and at least \$25 per Documented Fraud-Related Inconvenience claim.

The other half of the Settlement Fund, plus any unclaimed amounts in the Documented Fraud Fund, will be distributed in equal shares to all Settlement Class Members who do not receive payments from the Documented Fraud Fund.

In addition, UPMC will pay up to \$200,000 to cover the costs of notice and settlement administration, and, if approved by the Court, UPMC will pay up to \$750,000 in costs and expenses to attorneys for the Settlement Class, and service awards of \$3,000 to each of the seven Class Representatives.

9. How much will my payment be?

The amount of your payment will depend on several factors and variables, such as whether you submit a claim, or do nothing and accept the automatic payment; the approved amount of any claim you submit; and the total value of all approved claims.

- **Automatic “Unclaimed Distributions” – No Claim Form Required.** If you did not experience any type of fraud losses or fraud-related inconveniences after the 2014 UPMC Data Breach, or you do not wish to submit a Claim Form, you will automatically receive a payment as a result of this Settlement. You do not need to do anything. This automatic payment will be approximately \$10–\$20 per Settlement Class Member, depending on variables such as the total value of approved claims and the total cost of settlement administration.

If you wish to submit a claim, there are two types to choose from based on your circumstances:

- **Documented Out-of-Pocket Fraud Loss Claims:** If you suffered documented, unreimbursed out-of-pocket losses related to the 2014 UPMC Data Breach, you may submit a claim to receive up to the amount of your loss or \$5,000, whichever is less. The amount received may be subject to pro rata reduction as discussed below. This type of claim must be supported with documentation. The acceptable forms of documentation are described on the enclosed Claim Form. Documented Out-of-Pocket Fraud Loss Claims can include claims related to unreimbursed losses you suffered as a result of completed or attempted acts of identity theft or fraud involving the use of personally identifying information, such as (1) submission of a fraudulent tax return in your name resulting in tax refund theft or mis-delivery; (2) opening of a fraudulent financial account in your name; (3) hijacking control over an existing financial account owned by you through fraudulent address or password changes; and (4) the posting of a fraudulent transaction against a financial account in your name, resulting in a loss of your money. To be valid, the claim must relate to *unreimbursed* losses you experienced between January 1, 2014, and December 31, 2016, or, if the loss occurred after December 31, 2016, you must provide additional documentation that indicates a

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direct causal link between your loss and the 2014 UPMC Data Breach. Claims are subject to review and approval by the Court-appointed Settlement Administrator, and there is no guarantee that a Documented Out-of-Pocket Claim will be approved in full or part.

- **Documented Fraud-Related Inconvenience Claims:** If you experienced fraud or identity theft likely related to the 2014 UPMC Data Breach and spent time investigating and addressing the incident(s), or you lost the use of some identifiable amount of your money for at least one month as a result of fraud before the money was restored or reimbursed, you may submit a claim for up to \$250. This claim may include payment towards time you spent related to the fraud incident(s), at \$25 per hour for a maximum of 10 hours; or up to \$50 per month that an identifiable sum of money was unavailable to you before it was restored, up to a maximum of 5 months. You may combine claims for time you spent and the time you did not have access to your money, but in no event will your claim be approved for more than \$250. This type of claim must be supported with documentation. The acceptable forms of documentation are described on the enclosed Claim Form. To be valid, the claim must relate to a fraud incident or incidents you experienced between January 1, 2014, and December 31, 2016, or, if the fraud occurred after December 31, 2016, you must provide additional documentation that indicates a direct causal link between the fraud and the 2014 UPMC Data Breach. Claims are subject to review and approval by the Court-appointed Settlement Administrator, and there is no guarantee that a Documented Fraud-Related Inconvenience Claim will be approved in full or part. Further, these types of claims are subject to availability of funds and may not be paid at all, as described below.
- You may submit both a Documented Out-of-Pocket Fraud Loss Claim and a Documented Fraud-Related Inconvenience Claim, but in no circumstances will you receive more than \$5,250 or the maximum value of your documented, approved claims, whichever is less.

First, the Court-approved Settlement Administrator will review all submitted claims and determine their validity. If the aggregate value of all approved claims is less than amount of the Documented Fraud Fund, then the Settlement Administrator will pay all the approved claims in full. Any funds remaining in the Documented Fraud Fund will then roll over into the Unclaimed Distributions Fund to be used for Unclaimed Distributions.

If the aggregate value of all approved claims exceeds the amount of the Documented Fraud Fund, the Settlement Administrator will give priority to Documented Out-of-Pocket Fraud Loss Claims and determine whether those claims can be paid in full by making pro rata, proportional reductions of Documented Fraud-Related Inconvenience Claims, while preserving a minimum payment amount of \$25 for Documented Fraud-Related Inconvenience Claims. **If the Documented Fraud Fund is insufficient to pay both all Document Out-of-Pocket Fraud Loss Claims in full and a minimum of \$25 per Documented Fraud-Related Inconvenience Claim, then no Documented Fraud-Related Inconvenience Claims will be paid at all.** Instead, the Documented Out-of-Pocket Fraud Loss Claims will be paid in full and any remaining amounts in the Documented Fraud Fund will roll over to the Unclaimed Distributions Fund, or the Documented Out-of-Pocket Fraud Loss Claims will be paid as fully as possible after making proportional pro rata reductions to those claims. In other words, the payment of any Documented Fraud-Related Inconvenience Claims is conditioned on the availability of sufficient funds in the Documented Fraud Fund to pay a minimum of \$25 per Documented Fraud-Related Inconvenience Claim.

HOW TO GET A PAYMENT – SUBMITTING A CLAIM FORM

10. How can I get a payment?

You do not need to submit a Claim Form to receive the \$10–\$20 automatic payment. All Settlement Class Members that wish to receive compensation other than the automatic Unclaimed Distribution payment must complete and submit a Claim Form and follow its instructions, including submitting supporting documentation as needed. The Claim Form is included with this Notice. You may also get this Claim Form on the internet at www.UPMCDittmanSettlement.com.

To properly complete and timely submit a Claim Form, you should read the instructions carefully, include all information required by the Claim Form, sign it, and either submit the signed Claim Form electronically through www.UPMCDittmanSettlement.com by **November 19, 2021**, or mail it to the Settlement Administrator postmarked no later than November 19, 2021, at the following address:

UPMC Data Breach Settlement Administrator
P.O. Box 5838
Portland, OR 97228-5838

The Settlement Administrator will review your claim to determine its validity and the amount of your payment.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.

11. When would I get my payment?

The Court will hold a hearing on **December 29, 2021**, to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain whether these appeals can be resolved and resolving them takes time, perhaps more than a year. Payments to Settlement Class Members will be made after the Settlement is finally approved and any appeals or other required proceedings have been completed as set forth in the Settlement Agreement. You may visit www.UPMCDittmanSettlement.com for updates on the progress of the Settlement. Please be patient.

12. What am I giving up to get a payment or remain in the Settlement Class?

Unless you exclude yourself from the Settlement, you cannot sue, or be part of any other lawsuit against, UPMC or Defendants' Released Persons (as defined in the Settlement) relating to the 2014 UPMC Data Breach. The specific claims you are giving up against UPMC and Defendants' Released Persons are described in the Settlement Agreement. The terms of the release are described in Section 9 of the Settlement Agreement. Read it carefully. The Settlement Agreement is available at www.UPMCDittmanSettlement.com.

If you have any questions, you can talk to the Settlement Administrator or Settlement Class Counsel listed in Question 16 for free, or you can, of course, talk to your own lawyer if you have questions about what this means.

If you want to keep your rights to sue or continue to sue UPMC based on claims this Settlement resolves, you must take steps to exclude yourself from the Settlement Class (see Questions 13–15).

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How can I opt out of the Settlement?

To exclude yourself from the Settlement, or “opt out,” you must send a letter by U.S. Mail that includes the information in the bullet points below. If you fail to include this information, the notice of exclusion will be ineffective and the Settlement Class Member will be bound by the Settlement, including all releases.

- The name of this Litigation (*Dittman et al. v. UPMC et al.*, Case No. GD 14-003285 [Allegheny Cty. Ct. Com. Pl.]);
- Your full name, address, phone number, and signature;
- The words “Request for Exclusion” at the top of the document or a statement in the body of the document requesting exclusion from the Settlement;
- If you are filing a request for exclusion on behalf of an incapacitated or deceased Settlement Class Member for whom you are legally authorized to act, you must include your name, address, phone number, signature, and relationship to the Settlement Class Member, as well as that person's name and address.

You must mail via First-Class postage prepaid United States Mail the completed above-described letter, postmarked no later than **November 19, 2021**, to each of the following addresses:

Settlement Administrator

UPMC Data Breach
Settlement Administrator
P.O. Box 5838
Portland, OR 97228-5838

Settlement Class Counsel

Gary F. Lynch
Jamisen A. Etzel
CARLSON LYNCH LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222

Defense Counsel

John C. Conti
Jeffrey J. Wetzel
Steven L. Ettinger
DICKY MCCAMEY
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

If you ask to be excluded, you will not get any payment as part of this Settlement, and you cannot object to this Settlement. You will not be legally bound by anything that happens in the Settlement and related proceedings. You will be able to sue (or continue to sue) UPMC in the future. If you both object to the Settlement and seek to exclude yourself, you will be deemed to have excluded yourself.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.

14. If I don't opt out, can I sue UPMC for the same thing later?

No. Unless you exclude yourself from the Settlement, you give up any right to sue UPMC and Defendants' Released Persons (as defined in the Settlement Agreement) for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from this Settlement to continue your own lawsuit. Remember, the exclusion deadline is **November 19, 2021**.

15. If I exclude myself, can I get money from this Settlement?

No. If you exclude yourself, do not send in a Claim Form asking for a payment.

THE LAWYERS AND INDIVIDUALS REPRESENTING YOU

16. Do I have a lawyer in the case?

Yes. The Court appointed to represent you and other members of the Settlement Class the law firm of Carlson Lynch, LLP, in Pittsburgh, Pennsylvania ("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.

17. How will the lawyers and individuals representing the class be paid?

Class Counsel joined with other law firms to initiate the lawsuit and prosecuted the case on behalf of Settlement Class Members for more than six years, including taking appeals of pretrial legal rulings to the Superior and Supreme Courts of Pennsylvania. Class Counsel worked on a contingent basis, which means that they would receive a fee only if the lawsuit was successful. None of the lawyers has yet received any payment for their time or expenses. The lawyers intend to ask the Court to approve an award of \$750,000, to be paid separately by UPMC, as attorneys' fees and expenses to compensate them for their time, the financial risk that they undertook, and the out-of-pocket costs they advanced. UPMC has agreed not to object to these requests.

The Settlement Class is represented by seven named individuals (the "Settlement Class Representatives"). In addition to the benefits that the Settlement Class Representatives will receive as members of the Settlement Class—and subject to the approval of the Court—UPMC has agreed to pay service awards of \$3,000 to each of the Settlement Class Representatives for the efforts that they have expended on behalf of the Settlement Class. The amount of the service awards approved by the Court will be paid separately by UPMC.

The Court will determine whether to approve the amount of fees and costs and expenses requested by Class Counsel and the proposed service awards to the Settlement Class Representatives at the Final Approval Hearing scheduled for December 29, 2021. Class Counsel will file an application for fees, expenses, and service awards no later than November 5, 2021. The application will be available on the Settlement Website (www.UPMCDittmanSettlement.com) or you can request a copy by contacting the Settlement Administrator (*see* Question 23).

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can object to the Settlement if you do not think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. The Court will consider your views. If you both object to the Settlement and seek to exclude yourself, you will be deemed to have excluded yourself and your objection will be deemed null and void.

Your objection must be in writing, and must include:

- The name of this Litigation: *Dittman et al. v. UPMC et al.*, Case No. GD 14-003285 (Allegheny Cty. Ct. Com. Pl.);
- Your full name, address, email address, and telephone number, and if the objection is filed by someone else on your behalf, that person's full name, address, email address, and telephone number;
- An explanation of the basis for why you are a Settlement Class Member;
- Whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;

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- All grounds for the objection stated with specificity, accompanied by any legal support for the objection;
- The identity of all counsel 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 Agreement, Class Counsel's request for attorney's fees, costs, and expenses, or the application for Service Awards;
- The identity of all representatives (including counsel representing the objector) who will appear at the Final Approval Hearing, and if the objector is represented by an attorney, that attorney's legal background and prior experience in class litigation, the amount of fees sought by the attorney and legal justification for such fees, a statement regarding how the sought fees are being calculated, the number of hours spent by the attorney on the objection or the case, the attorney's hourly rate, and a description of any agreements related to the objection between the objector and the attorney or any other person or entity;
- A description of all evidence to be presented at the Final Approval Hearing in support of the objection, including a list of any witnesses, a summary of the expected testimony from each witness, and a copy of any documents or other non-oral material to be presented;
- **All other information specified in the Preliminary Approval Order** (available on the Settlement Website, www.UPMCDittmanSettlement.com), including, but not limited to, information relating to any objections you or your counsel have filed in other class action litigation and any agreements that relate to your objection; and
- Your signature or your attorney's signature on the written objection.

Any objection must be either filed electronically with the Court or mailed to the Clerk of Court, Class Counsel, and UPMC's counsel at the addresses set forth below. The objection must be filed with the Court—or if mailed it must be postmarked—no later than **November 19, 2021**.

Court

Clerk of the Court
Michael McGeever
Allegheny County Courthouse
Room 114
436 Grant Street
Pittsburgh, PA 15219

Settlement Class Counsel

Gary F. Lynch
Jamisen A. Etzel
CARLSON LYNCH LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222

Defense Counsel

John C. Conti
Jeffrey J. Wetzel
Steven L. Ettinger
DICKEY MCCAMEY
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

In addition, any Settlement Class Member that objects to the proposed Settlement Agreement may be required to appear for deposition regarding the grounds for their objection, and must provide along with its objection the dates when the objector will be available to be deposed up until the date five days before the Final Approval Hearing.

19. What is the difference between objecting and excluding myself/opting out?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object to the benefits provided by the Settlement or other terms of the Settlement only if you stay in the Settlement Class. Excluding yourself or "opting out" is telling the Court that you don't want to be included in the Settlement Class. If you exclude yourself, you have no basis to object to the Settlement and related releases because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at **9:30 a.m. on December 29, 2021**, in Courtroom 820 before Judge Philip A. Ignelzi of the Court of Common Pleas of Allegheny County, Pennsylvania, City-County Building, 414 Grant Street, Pittsburgh, PA 15219, or at such other time, location, and venue as the Court may Order. This hearing date and time may be moved. Please refer to the Settlement Website (www.UPMCDittmanSettlement.com) for notice of any changes.

By no later than November 29, 2021, Class Counsel shall file a motion for final approval of the Settlement. Objectors, if any, shall file any response to Class Counsel's motions no later than December 10, 2021. By no later than December 17, 2021, responses shall be filed, if any, to any filings by objectors, and any replies in support of final approval of the Settlement and/or Class Counsel's application for attorneys' fees, costs, and expenses and for Service Awards shall be filed.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.

At the Final Approval Hearing, the Court will consider, among other things, whether the Settlement is fair, reasonable, and adequate; how much Plaintiffs' lawyers will receive as attorneys' fees and costs and expenses; and whether to approve service awards to the Settlement Class Representatives. If there are objections, the Court will consider them. The Court will listen to people at the hearing who file in advance a timely notice of their intention to appear (*see* Question 18). At or after the Final Approval Hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

21. Do I have to attend the hearing?

No. Class Counsel will answer questions the Court may have. You are welcome, however, to come at your own expense. If you submit an objection, you do not have to come to the Court to talk about it. As long as you submitted your objection timely and in accordance with the requirements for objecting set out of the Settlement (*see* Question 18), the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing, you will remain a part of the Settlement Class and will receive a payment from the Unclaimed Distribution Fund, but no additional money. The amount of the payment is likely to be between \$10 and \$20. And, unless you exclude yourself, you will not be able to sue UPMC about the claims being resolved through this Settlement ever again. See the Settlement Agreement for more details about the releases.

GETTING MORE INFORMATION

23. How do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement itself. You can get a copy of the Settlement Agreement at www.UPMCDittmanSettlement.com or from the Settlement Administrator by calling toll-free 1-855-535-1794.

Please do not contact the Court or UPMC with questions about the Settlement.

Questions? Call 1-855-535-1794 toll-free or visit www.UPMCDittmanSettlement.com.