

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE: MOVEIT CUSTOMER DATA  
SECURITY BREACH LITIGATION

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MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:  
C.A. No. 1:23-cv-12993-ADB

MICHAEL EVANGELISTA, individually  
and on behalf of all others similarly  
situated,

PLAINTIFF,

v.

NATIONAL STUDENT  
CLEARINGHOUSE and PROGRESS  
SOFTWARE CORPORATION,

DEFENDANTS.

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**DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION  
AND ADEQUACY OF NOTICE PROGRAM**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. Epiq recently rebranded Hilsoft Notifications as Epiq Legal Noticing. Epiq and Epiq Legal Noticing will hereinafter be referred to as “Epiq.”

DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION AND  
ADEQUACY OF NOTICE PROGRAM

4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq.

### **OVERVIEW**

5. This declaration describes the notice program (“Notice Program”) and notices (the “Notice” or “Notices”) for *Evangelista v. National Student Clearinghouse, et al.*, Case No. 1:23-cv-12993-ADB, which has been transferred to and coordinated with *In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ADB, pending in the United States District Court for the District of Massachusetts. I previously executed my *Declaration of Cameron R. Azari, Esq. Regarding Notice Program* (“Notice Program Declaration”) on September 20, 2024, which described the Notice Program, detailed Epiq’s class action notice experience, and attached Epiq’s *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice programs.

### **NOTICE PROGRAM METHODOLOGY**

6. Federal Rules of Civil Procedure, Rule 23 directs that notice must be “the best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort,” and that “the notice may be by one or more of the following: United States mail, electronic means, or other appropriate means.”<sup>1</sup> The Notice Program satisfied these requirements.

7. This Notice Program was designed and implemented to reach the greatest practicable number of Settlement Class Members. The Notice Program’s individual notice efforts via email and/or mail to identified Settlement Class Members reached approximately 95.8% of the Settlement Class. The reach was further enhanced by a Settlement Website. In my experience, the reach of the Notice Program was consistent with other court-approved notice plans, was the

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<sup>1</sup> Fed. R. Civ. P. 23(c)(2)(B).

best notice practicable under the circumstances of this case, and satisfied the requirements of due process, including its “desire to actually inform” requirement.<sup>2</sup>

### **NOTICE PROGRAM DETAIL**

8. On October 11, 2024, the Court approved the Notice Program and appointed Epiq as the Settlement Administrator in the *Order of Preliminary Approval* (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court approved and certified, for settlement purposes, the following “Settlement Class”:

All persons in the United States whose Social Security Number was included in the files affected by the Security Incident.<sup>3</sup>

Excluded from the Settlement Class are: (i) NSC, any entity in which NSC has a controlling interest, and NSC’s officers, directors, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and judicial staff; and (iii) any individual who timely and validly opts out of the Settlement.

9. After the Court’s Preliminary Approval Order was entered, Epiq began to implement the Notice Program. This declaration details the notice activities undertaken to date, and explains how and why the Notice Program was comprehensive and well-suited to reach the Settlement Class Members. This declaration also discusses the administration activity to date.

### **NOTICE PROGRAM**

#### ***Individual Notice***

10. On December 26, 2024, Epiq received two data files with 1,473,805 Settlement Class Member records, which included names, last known addresses, and/or email addresses (“Class List”). Epiq de-duplicated and rolled-up the records and loaded the unique, identified

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<sup>2</sup> *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”).

<sup>3</sup> The exploitation of the MOVEit Transfer Software vulnerability on or around May 2023 that impacted thousands of entities that used the software, including NSC.

Settlement Class Member records into its database for this Settlement. These efforts resulted in 1,470,038 unique, identified Settlement Class Member records (37,885 records did not have a valid address available and were not sent a Notice). An Email Notice was sent to all identified Settlement Class Members for whom a valid email address was provided, and a Short Form Postcard Notice (“Postcard Notice”) was sent via United States Postal Service (“USPS”) first class mail to all identified Settlement Class Members with an associated physical address for whom a valid email address was not available, or for whom the Email Notice was returned as undeliverable after several attempts.

*Individual Notice – Email*

11. Commencing on February 24, 2025, Epiq sent 1,161,962 Email Notices to 1,157,662 identified Settlement Class Members for whom a valid email address was provided. Some identified Settlement Class Member records had more than one valid email address and were sent an Email Notice to each valid email address. Also, some valid email addresses were associated with multiple identified Settlement Class Members with the same email address, and only one Email Notice was sent per email address.

12. The following industry standard best practices were followed for the Email Notice efforts. The Email Notice was drafted in such a way that the subject line, the sender, and the body of the message overcame SPAM filters and ensured readership to the fullest extent reasonably practicable. For instance, the Email Notices used an embedded html text format. This format provided easy-to-read text without graphics, tables, images and other elements that in our experience would have increased the likelihood that the message would have been blocked by Internet Service Providers (ISPs) and/or SPAM filters for this type of communication. The Email Notices were sent from an IP address known to major email providers as one not used to send bulk “SPAM” or “junk” email blasts. Each Email Notice was transmitted with a digital signature to the header and content of the Email Notice, which allowed ISPs to programmatically authenticate that the Email Notices were from our authorized mail servers. Each Email Notice was also transmitted with a unique message identifier. The Email Notices included an embedded

DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION AND  
ADEQUACY OF NOTICE PROGRAM

link to the Settlement Website. By clicking the link, recipients were able to access the Long Form Notice and additional information about the case. The Email Notice is included as **Attachment 1**.

13. If the receiving email server could not deliver the message, a “bounce code” was returned along with the unique message identifier. For any Email Notice for which a bounce code was received indicating the message was undeliverable for reasons such as an inactive or disabled account, the recipient’s mailbox was full, technical autoreplies, etc., at least two additional attempts were made to deliver the Notice by email.

***Individual Notice – Direct Mail***

14. On February 24, 2025, Epiq sent 274,491 Postcard Notices to all identified Settlement Class Members for whom only a physical address was provided. Subsequently, commencing on March 14, 2025, Epiq sent 209,207 Postcard Notices to all identified Settlement Class Members for whom the Email Notice was returned as undeliverable after multiple attempts. The Postcard Notice was sent via USPS first class mail. In addition, the Postcard Notice also directed the recipients to the Settlement Website where they could access the Long Form Notice and additional information about the Settlement. The Postcard Notice is included as **Attachment 2**.

15. Prior to sending the Postcard Notices, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the USPS to ensure Settlement Class Member address information was up-to-date and accurately formatted for mailing.<sup>4</sup> In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and were verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

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<sup>4</sup> The NCOA database is maintained by the USPS and consists of approximately 160 million permanent change-of-address (“COA”) records consisting of names and addresses of individuals, families, and businesses who have filed a change-of-address with the Postal Service™. The address information is maintained on the database for 48 months and reduces undeliverable mail by providing the most current address information, including standardized and delivery point coded addresses, for matches made to the NCOA file for individual, family, and business moves.

16. The return address on the Postcard Notices is a post office box that Epiq maintains for this Action. The USPS automatically forwarded Postcard Notices with an available forwarding address order that has not expired (“Postal Forwards”). Postcard Notices returned as undeliverable are re-mailed to any new address available through USPS information, (for example, to the address provided by the USPS on returned mail pieces for which the automatic forwarding order has expired, but is still within the time period in which the USPS returns the piece with the address indicated), and to better addresses that are found using a third-party lookup service. Upon successfully locating better addresses, Postcard Notices are promptly re-mailed. As of April 10, 2025, Epiq has remailed 24,473 Postcard Notices.

17. Additionally, a Long Form Notice and Claim Form (“Notice Package”) was mailed to all persons who requested one via the toll-free telephone number or other means. As of April 10, 2025, Epiq has mailed 178 Notice Packages as a result of such requests. The Long Form Notice is included as **Attachment 3**. The Claim Form is included as **Attachment 4**.

#### *Notice Results*

18. As of April 10, 2025, an Email Notice and/or Postcard Notice was delivered to 1,409,234 of the 1,470,038 unique, identified Settlement Class Members. This means the individual notice efforts reached approximately 95.8% of the identified Settlement Class Members.

#### *Settlement Website*

19. On February 21, 2025, Epiq established a dedicated website for the Settlement with an easy-to-remember domain name ([www.NSCSettlement.com](http://www.NSCSettlement.com)). Relevant documents are posted on the Settlement Website, including the Long Form Notice, Claim Form, Settlement Agreement, Proposed Settlement Benefit Plan, and Preliminary Approval Order. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions (“FAQs”), instructions for how Settlement Class Members may opt-out (request exclusion) from or object to the Settlement, contact information for the Settlement Administrator, and how to obtain other case-related information. Settlement Class Members are also able to file a Claim Form on the Settlement Website. The Settlement Website address was prominently displayed in all notice documents. As

of April 10, 2025, there have been 37,079 unique visitor sessions to the Settlement Website, and 162,832 web pages have been presented.

***Toll-Free Telephone Number***

20. On February 21, 2025, Epiq established a toll-free telephone number (1-888-366-9156) for the Settlement. Callers are able to hear an introductory message and have the option to learn more about the Settlement in the form of recorded answers to FAQs, and to request that a Notice Package be mailed to them. This automated telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was prominently displayed in all notice documents. As of April 10, 2025, there have been 1,020 calls to the toll-free telephone number representing 2,387 minutes of use.

21. A postal mailing address was established and continues to be available, allowing Settlement Class Members the opportunity to request additional information or ask questions.

***Requests for Exclusion and Objections***

22. The deadline to request exclusion from the Settlement or to object to the Settlement is April 25, 2025. As of April 10, 2025, Epiq has received six requests for exclusion. As of April 10, 2025, Epiq is aware of no objections to the Settlement. Epiq will provide the Court with an exclusion report via a supplemental declaration filed in advance of the Final Approval Hearing.

***Claim Submission & Distribution Options***

23. The Notices provided a detailed summary of relevant information about the Settlement, including the Settlement Website address and how Settlement Class Members can file a Claim Form online or by mail. Settlement Class Members are given the option of receiving a digital payment or a traditional paper check.

***Reminder Notice***

24. Epiq is currently preparing to send a Reminder Email Notice prior to the claim filing deadline to Settlement Class Members for whom a valid email address is available and was not returned as undeliverable for the initial notice efforts, and who have not yet filed a Claim Form or requested exclusion from the Settlement.

## CONCLUSION

25. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice program be designed to reach the greatest practicable number of potential class members, and that the notice or notice program provide class members with easy access to the details of how the class action may impact their rights. All of these requirements were met in this case.

26. The Notice Program included individual notice via email and/or mail to the identified Settlement Class Members. With the address updating protocols that were used, the Notice Program individual notice efforts reached approximately 95.8% of the Settlement Class Members. The reach was further enhanced by a Settlement Website. The Federal Judicial Center’s (“FJC”) Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide, which is relied upon for federal cases, states that, “the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%.”<sup>5</sup> Here, we have developed and implemented a Notice Program that readily achieved a reach at the high end of that standard.

27. The Notice Program followed the guidance for satisfying due process obligations that a notice expert gleans from the United States Supreme Court’s seminal decisions, which emphasize the need: (a) to endeavor to actually inform the Settlement Class, and (b) to ensure that notice is reasonably calculated to do so.

- a) “[W]hen notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950); and
- b) “[N]otice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to

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<sup>5</sup> FED. JUDICIAL CTR, JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.




present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) (citing *Mullane*, 339 U.S. at 314).

28. The Notice Program provided the best notice practicable under the circumstances, conformed to all aspects of Federal Rule of Civil Procedure 23 regarding notice, comported with the guidance for effective notice articulated in the Manual for Complex Litigation, Fourth and applicable FJC materials, and satisfied the requirements of due process, including its “desire to actually inform” requirement.

29. The Notice Program schedule afforded enough time to provide full and proper notice to the Settlement Class Members before the Opt Out Deadline and Objection Deadline.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 10, 2025.

  
\_\_\_\_\_  
Cameron R. Azari, Esq.

# Attachment 1

**From:** MoveIT National Student Clearinghouse Settlement Administrator  
<nscsettlement@e.epiqnotice.com>  
**To:** [REDACTED]  
**Subject:** Notice of MOVEit Security Incident Class Action Settlement

**File your claim for up to \$100 by May 26, 2025.**

Your Unique ID and PIN are Name: [REDACTED]

UniqueID: [REDACTED]

PIN: [REDACTED]

Name: [REDACTED]

UniqueID: [REDACTED]

PIN: [REDACTED]

Name: [REDACTED]

UniqueID: [REDACTED]

PIN: [REDACTED]

A Settlement has been proposed in a class action lawsuit against National Student Clearinghouse (“Defendant” or “NSC”). The Settlement resolves claims brought by an individual impacted by the MOVEit Security Incident, which occurred in May 2023 and resulted in the potential compromise of individuals’ personally identifying information. Defendant denies any allegation of wrongdoing.

**Who’s included?** You are included in the Settlement as a “Settlement Class Member” because you have been identified as a person whose Social Security number may have been accessed or exposed during the MOVEit Security Incident.

**What does the Settlement provide?** Under the Settlement, NSC will pay \$9,950,000 into a Settlement Fund which will be used to pay all valid claims made by Settlement Class Members, notice and administration costs, Service Award, and attorneys’ fees and costs. Settlement Class Members may file a claim to receive **either** (1) reimbursement of ordinary losses up to \$2,500 and reimbursement of extraordinary losses up to \$10,000 **or** (2) an alternative cash payment of \$100 (subject to pro rata reduction or increase based on total claim submission). All Settlement Class Members may also file a claim to receive two (2) years of identity theft protection services.

**How do I get a payment?** You must complete and submit a Claim Form by **May 26, 2025**. Claim Forms may also be submitted online at

[NSCSettlement.com](https://NSCSettlement.com) or printed from the website and mailed to the address on the form. You may need your Unique ID and PIN number above.

**What are my other options?** If you do nothing, your rights will be affected, and you won't get a payment. If you don't want to be legally bound by the Settlement, you must exclude yourself from it by **April 25, 2025**. Unless you exclude yourself, you won't be able to sue or continue to sue NSC or other released parties as defined in the Settlement Agreement for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (i.e., don't exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the hearing—at your own cost—but you don't have to. Objections and requests to appear are due by **April 25, 2025**. More information about these options is available at [NSCSettlement.com](https://NSCSettlement.com).

**The Court's hearing.** The Court will hold a Final Approval Hearing in this case (*Evangelista v. National Student Clearinghouse et al.*, Case No. 1:23-cv-12993-ADB [D. Mass.]) on **May 12, 2025**. At the hearing, the Court will decide whether to approve the Settlement, Class Counsel's request for attorneys' fees and costs, and a Service Award to the Settlement Class Representative (up to \$5,000 total). You or your lawyer may appear at the hearing at your own expense.

**Questions?** This Notice provides only a high-level summary of the Settlement. More detail, including the Settlement Agreement, is provided at [NSCSettlement.com](https://NSCSettlement.com), or you can call the Settlement Administrator at 888-366-9156.

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If [REDACTED] should not be subscribed or if you need to change your subscription information for MOVEit National Student Clearinghouse, [please use this preferences page](#).

# Attachment 2

MOVEit National Student Clearinghouse  
Settlement Administrator  
P.O. Box 2878  
PORTLAND, OR 97208-2878

**Notice of MOVEit Security Incident**  
**Class Action Settlement**

**A Settlement has been proposed  
in a class action lawsuit about  
a MOVEit Security Incident  
that potentially compromised  
your personally identifying  
information.**

Unique ID: [REDACTED]  
PIN: [REDACTED]

[REDACTED]

A Settlement has been proposed in a class action lawsuit against National Student Clearinghouse (“Defendant” or “NSC”). The Settlement resolves claims brought by an individual impacted by the MOVEit Security Incident which occurred in May 2023 and resulted in the potential compromise of individuals’ personally identifying information. Defendant denies any allegation of wrongdoing.

**Who’s Included?** You are included in the Settlement as a “Settlement Class Member” because you have been identified as a person whose Social Security number may have been accessed or exposed during the MOVEit Security Incident.

**What does the Settlement provide?** Under the Settlement, NSC will pay \$9,950,000 into a Settlement Fund which will be used to pay all valid claims made by Settlement Class Members, notice and administration costs, service award, and attorneys’ fees and costs. Settlement Class Members may file a claim to receive **either** (1) reimbursement of ordinary losses up to \$2,500 and reimbursement of extraordinary losses up to \$10,000 **or** (2) an alternative cash payment of \$100 (subject to pro rata reduction or increase based on total claim submission). All Settlement Class Members may also file a claim to receive two (2) years of identity theft protection services.

**How do I get a Payment?** You must complete and submit a Claim Form by **May 26, 2025**. Claim Forms may also be submitted online at NSCSettlement.com or printed from the website and mailed to the address on the form.

**What are my other options?** If you do nothing, your rights will be affected, and you won’t get a payment. If you don’t want to be legally bound by the Settlement, you must exclude yourself from it by **April 25, 2025**. Unless you exclude yourself, you won’t be able to sue or continue to sue NSC or other released parties as defined in the Settlement Agreement for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (i.e., don’t exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the hearing—at your own cost—but you don’t have to. Objections and requests to appear are due by **April 25, 2025**. More information about these options is available at NSCSettlement.com.

**The Court’s hearing.** The Court will hold a Final Approval Hearing in this case (*Evangelista v. National Student Clearinghouse et al.*, Case No. 1:23-cv-12993-ADB (D. Mass.)) on May 12, 2025. At the hearing, the Court will decide whether to approve the Settlement; Class Counsel’s request for attorneys’ fees and costs; and a service award to the Settlement Class Representative (up to \$5,000 total). You or your lawyer may appear at the hearing at your own expense.

**Questions?** This Notice provides only a high-level summary of the Settlement. More detail, including the Settlement Agreement, is provided at NSCSettlement.com, or you can call the Settlement Administrator at 888-366-9156.

# Attachment 3



Notice of National Student Clearinghouse  
Data Breach Class Action Settlement

**If you received notice from National Student Clearinghouse that your personally identifying information was potentially compromised in the 2023 MOVEit Security Incident, you could get a payment from a class action settlement.**

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

**Please read this Notice carefully and completely, as your legal rights are affected whether you act or don't act.**

**THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.**

- A Settlement has been proposed in a class action lawsuit against National Student Clearinghouse (“Defendant” or “NSC”). The Settlement resolves claims against NSC brought by an individual impacted by the MOVEit Security Incident as it relates to Social Security numbers (generally, Personal Identifying Information (“PII”)) provided by data owners to NSC, which occurred in May 2023. The MOVEit Security Incident resulted from an alleged vulnerability in the third-party file transfer software, MOVEit Transfer, that NSC used in its ordinary course of business. Claims against Progress Software Corporation (“Progress”), the licensor of the MOVEit software, have not been resolved, and the litigation will continue against Progress.
- Under the proposed Settlement, you may be eligible to receive two (2) years of credit monitoring and identity theft protection services in addition to reimbursement of ordinary losses up to \$2,500; reimbursement of extraordinary losses up to \$10,000; or an alternative cash payment of up to \$100 (subject to pro rata reduction or increase pending total claim submission). To receive a cash payment and/or credit monitoring services, you must complete and timely submit a Claim Form, subject to approval by the Settlement Administrator.
- Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make now.

<b>SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS</b>		<b>DEADLINE</b>
<b>Submit a Claim Form</b>	The only way to receive a payment.	Online or Postmarked by May 26, 2025.
<b>Exclude Yourself by Opting Out</b>	Get no payment. Keep your right to file your own lawsuit against NSC and the relevant data provider for the same claims resolved by this Settlement. Please note that if you opt out, you cannot also object to the Settlement.	Postmarked by April 25, 2025.
<b>Object to the Settlement and/or Attend a Hearing</b>	Tell the Court the reasons why you do not believe the Settlement should be approved. You can also ask to speak to the Court at the hearing on May 12, 2025, about the fairness of the Settlement, with or without your own attorney.	Postmarked by April 25, 2025.
<b>Do Nothing</b>	Get no payment and be bound by the terms of 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 after any appeals are resolved.

**Questions? Go to [NSCSettlement.com](https://NSCSettlement.com) or call (888) 366-9156**

**WHAT THIS NOTICE CONTAINS**

**BASIC INFORMATION ..... 3**

- 1. Why did I get this Notice?
- 2. What is this lawsuit about?
- 3. What is a class action?
- 4. Why is there a settlement?

**WHO IS IN THE SETTLEMENT..... 3**

- 5. Who is in the Settlement?
- 6. Are there exceptions to being included?
- 7. What should I do if I’m not sure whether I am included?

**THE SETTLEMENT BENEFITS ..... 4**

- 8. What does the Settlement provide?
- 9. What can I get from the Settlement?
- 10. What am I giving up if I stay in the Class?

**HOW TO GET A PAYMENT – MAKING A CLAIM..... 5**

- 11. How can I get a payment?
- 12. How much will my payment be?
- 13. When will I get my payment?

**THE LAWYERS REPRESENTING YOU..... 5**

- 14. Do I have a lawyer in this case?
- 15. Should I get my own lawyer?
- 16. How will the lawyers be paid?

**EXCLUDING YOURSELF FROM THE SETTLEMENT ..... 6**

- 17. How do I get out of the Settlement?
- 18. If I am a Settlement Class Member and don’t opt out, can I sue the Defendant for the same thing later?
- 19. What happens if I opt out?

**COMMENTING ON OR OBJECTING TO THE SETTLEMENT..... 7**

- 20. How do I tell the Court I don’t like the Settlement?
- 21. What’s the difference between objecting and opting out?

**THE COURT’S FINAL APPROVAL HEARING ..... 8**

- 22. When and where will the Court decide whether to approve the Settlement?
- 23. Do I have to come to the Final Approval Hearing?
- 24. May I speak at the hearing?

**IF I DO NOTHING..... 8**

- 25. What happens if I do nothing at all?

**GETTING MORE INFORMTION..... 8**

- 26. Are more details about the Settlement available?
- 27. How do I get more information?

**Questions? Go to [NSCSettlement.com](https://www.NSCSettlement.com) or call (888) 366-9156**

## BASIC INFORMATION

### 1. Why did I get this Notice?

You received this Notice because you have been identified as a person whose PII may have been accessed or compromised during the 2023 MOVEit Security Incident as it relates to PII provided by data owners to NSC. A similarly situated individual brought a proposed class action lawsuit against NSC in 2023, alleging that NSC was negligent due to its data security practices. NSC denies the allegations and denies that it would be found liable. The parties have now reached a proposed settlement of the lawsuit.

A court authorized this Notice to inform you 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 all objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the payments that the Settlement allows, and the pending legal claims against NSC and certain others, including the entities that provided data to NSC, will be released and dismissed.

This package explains the lawsuit, the Settlement, your rights, what benefits may be available, who is eligible for them, and how to receive them. Judge Allison D. Burroughs of the United States District Court for the District of Massachusetts is in charge of this case. The case is *Evangelista v. National Student Clearinghouse et al.*, Case No. 1:23-cv-12993-ADB (D. Mass.), which has been transferred to and coordinated with *In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ABD (D. Mass.).

### 2. What is this lawsuit about?

This matter is a putative class action (the “Litigation”) arising from the MOVEit Security Incident whereby between May 28, 2023, and May 31, 2023, cybercriminals gained unauthorized access to the MOVEit file transfer software that was used by, among many others, NSC, resulting in potential access to certain PII, including Social Security numbers that were provided to NSC by data owners. The lawsuit asserts claims against NSC for alleged negligent data security practices.

Defendant denies any allegation of wrongdoing and denies that Plaintiff would prevail or be entitled to any relief should this matter proceed to be litigated.

### 3. What is a class action?

In a class action one or more people called “Class Representative(s)” sue on behalf of themselves and other people who have similar claims. This group of people is called the “class,” and the people in the class are called “Settlement Class Members” or the “Settlement Class.” One court resolves the issues for all Settlement Class Members, except for people who exclude themselves from the class. The person or persons who sue are called the Plaintiff(s). The entity sued—NSC—is called the Defendant.

### 4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendant. Instead, both sides agreed to a settlement. That way, they avoid the costs and risks of a trial, and Settlement Class Members can get benefits or compensation. The Settlement Class Representative and Class Counsel think the Settlement is in the best interest of the Settlement Class.

## WHO IS IN THE SETTLEMENT?

### 5. Who is in the Settlement?

The Settlement Class is defined as: “all persons in the United States whose Social Security number was included in the files affected by the Security Incident.”

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

Yes. The following are not included in the Settlement Class: (i) NSC, any entity in which NSC has a controlling interest, and NSC's officers, directors, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and judicial staff; and (iii) any individual who timely and validly opts out of the Settlement.

**7. What should I do if I am not sure whether I am included?**

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling the Settlement Administrator, Epiq Class Action & Claims Solutions, Inc. ("Epiq"), at (888) 366-9156 or you can visit NSCSettlement.com for more information.

**THE SETTLEMENT BENEFITS****8. What does the Settlement Provide?**

Under the Settlement, NSC will pay \$9,950,000 into a Settlement Fund which will be used to pay all valid claims made by Settlement Class Members, notice and administration costs, a Service Award to the Settlement Class Representative, and Class Counsel's attorneys' fees and expenses. Settlement Class Members may file a claim to receive **either** (1) reimbursement of ordinary losses up to \$2,500 and reimbursement of extraordinary losses up to \$10,000 **or** (2) an alternative cash payment of \$100 (subject to pro rata reduction or increase pending total claim submission). All Settlement Class Members may also file a claim to receive two (2) years of credit monitoring and identity theft protection services.

If the total value of all valid claims exceeds the Net Settlement Fund (the money remaining in the Settlement Fund after the notice and administration costs, Service Award, and attorneys' fees and expense are deducted), the alternative cash payments will be reduced pro rata. In the event all valid claims do not exhaust the Net Settlement Fund, the alternative cash payments will be increased pro rata, up to \$1,000. Any money that remains in the Net Settlement Fund 180 days after the Settlement's Effective Date will be used to extend the credit monitoring and identity theft protection services claimed by Settlement Class Members. No part of the Settlement Fund will revert to NSC.

**9. What can I get from the Settlement?**

Settlement Class Members may file a claim for one or more of the following settlement benefits.

**Credit Monitoring and Identity Theft Protection Services:** All Settlement Class Members may file a claim to receive (2) years of three-bureau credit monitoring and identity theft protection services that will include (i) dark web monitoring with user notification if potentially unauthorized use of a Settlement Class Member's personally identifiable information is detected; (ii) identity theft insurance of up to \$1 million United States Dollars; (iii) real-time credit monitoring with Equifax, Experian, and TransUnion; and (iv) access to fraud resolution and identity theft restoration agents.

In addition to credit monitoring and identity theft protection services, Settlement Class Members may file claims for the following:

**Reimbursement of Ordinary Losses:** Settlement Class Members may file a claim for reimbursement of ordinary losses up to \$2,500 (inclusive of up to four (4) hours of lost time at \$25 per hour (up to \$100 total)) incurred as a result of the MOVEit Security Incident. Such ordinary losses include, but are not limited to, bank fees, long distance phone calls, cell phone charges (only if charged by the minute), data charges (only if based on the amount of data used), postage, or gasoline for local travel.

**Reimbursement of Extraordinary Losses:** Settlement Class Members may file a claim for reimbursement of up to \$10,000 in compensation for proven monetary losses, professional fees (including attorneys' fees and accountants' fees), and fees for credit repair services incurred as a result of the Security Incident. In order to receive reimbursement of extraordinary losses, (1) the loss must be an actual, documented, and unreimbursed monetary loss; (2) the loss was more likely than not caused by the MOVEit Security Incident; (3) the loss occurred between May 31, 2023, and May 26, 2025; and (4) the loss is not covered by one or more of the reimbursement for ordinary loss categories.

**Questions? Go to NSCSettlement.com or call (888) 366-9156**

**Alternative Cash Payment:** In lieu of filing claims for reimbursement of ordinary or extraordinary losses, Settlement Class Members may elect to file a claim to receive a \$100 cash payment (subject to the potential pro rata reduction or increase described above) without the need to document losses or attest to time spent as a result of the MOVEit Security Incident.

## 10. What am I giving up if I stay in the Class?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Defendant and other released parties concerning the claims released by this Settlement. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The entire text of the Settlement Agreement can be viewed at NSCSettlement.com.

## HOW TO GET A PAYMENT – MAKING A CLAIM

### 11. How can I get a payment?

You must complete and submit a Claim Form by May 26, 2025. Claim Forms may be submitted by completing the enclosed Claim Form.

Be sure to read the Claim Form instructions carefully and provide all required information, including your signature.

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

### 12. How much will my payment be?

The amount of your payment will depend on the approved amount of your claim and the total value of all approved claims.

If you are seeking reimbursement for ordinary and/or extraordinary losses under the Settlement, you must describe the losses, their amount, and when and why you incurred them. You must also attest that you incurred those losses in response to the MOVEit Security Incident in this case.

Your claim must be reasonably documented. You must enclose or upload documentation sufficient to show (1) the amount of unreimbursed loss that you suffered and (2) why you believe that the loss is reasonably attributable to the MOVEit Security Incident in the case. Documents for financial expenses may include credit card or bank statements, emails, invoices, receipts, or telephone records, including photographs of the same. Personal statements or declarations are not considered reasonable documentation, but they may be used to provide clarification, context, or support for other documentation.

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

The Court will hold a Final Approval Hearing on May 12, 2025, at 10:00 a.m. EDT, to decide whether to approve the Settlement. Payments will be made after the Settlement is approved and becomes final (meaning there is no appeal from the order approving the Settlement or all appeals have been rejected). Updates regarding the Settlement will be posted on the Settlement Website, NSCSettlement.com.

## THE LAWYERS REPRESENTING YOU

### 14. Do I have a lawyer in this case?

The Court appointed Kristen A. Johnson of Hagens Berman Sobol Shapiro LLP; E. Michelle Drake of Berger Montague, PC; Gary F. Lynch of Lynch Carpenter, LLP; Douglas J. McNamara of Cohen Milstein Sellers & Toll PLLC; Karen H. Riebel of Lockridge Grindal Nauen PLLP; and Charles E. Schaffer of Levin Sedran & Berman LLP as attorneys to represent the Settlement Class. These lawyers are called Class Counsel. You will not be charged for their services.

**Questions? Go to NSCSettlement.com or call (888) 366-9156**

**15. Should I get my own lawyer?**

If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

**16. How will the lawyers be paid?**

The attorneys representing the Settlement Class have not yet received any payment for their legal services or any reimbursement of the costs or out-of-pocket expenses they have incurred. Class Counsel plans to ask the Court for an award of attorneys' fees and expenses of up to twenty-five percent (25%) of the Settlement Fund. Class Counsel will file their request for attorneys' fees and expenses as a percentage of the Settlement Fund.

The Settlement Class is represented by one named individual (the "Settlement Class Representative"). In addition to the benefits that the Settlement Class Representative will receive as member of the Settlement Class – and subject to the approval of the Court – Class Counsel will request a Service Award, not to exceed \$5,000, to the Settlement Class Representative for the efforts he has expended on behalf of the Settlement Class. Any Court-approved Service Award will be paid from the Settlement Fund.

The Court will determine whether to approve Class Counsel's request for attorneys' fees and expenses and the proposed Service Award to the Class Representative. Class Counsel will file an application for attorneys' fees and expenses and the Class Representative's Service Award no later than April 4, 2025. The application will be available on the Settlement Website, NSCSettlement.com, or you can request a copy by contacting the Settlement Administrator.

**EXCLUDING YOURSELF FROM THE SETTLEMENT****17. How do I get out of the Settlement?**

If you are a Settlement Class Member and you do not want the benefits from the Settlement, and you want to keep your right, if any, to sue Defendant on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from—or "opting out" of—the Settlement Class.

You may opt out of the Settlement by April 25, 2025. To opt out, you must send a letter or postcard via U.S. Mail to the address below. You must include the following in your letter or postcard:

- The name of this Litigation, or a decipherable approximation (*Evangelista v. National Student Clearinghouse et al.*, Case No. 1:23-cv-12993-ADB (D. Mass.));
- Your full name, address, telephone number, and signature;
- The words "Opt-Out" or "Requests for Exclusion" at the top of the document or a statement that you want to opt out of the Settlement; and
- 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 your opt-out request via prepaid First-Class Mail, postmarked no later than April 25, 2025 to the following address:

MOVEit National Student Clearinghouse  
Settlement Administrator  
P.O. Box 2878  
Portland, OR 97208-2878

If you fail to include the required information, your request will be deemed invalid and you will remain a Settlement Class Member and be bound by the Settlement, including all releases.

**Questions? Go to NSCSettlement.com or call (888) 366-9156**

**18. If I am a Settlement Class Member and don't opt out, can I sue the Defendant for the same thing later?**

No. You must opt out of the Settlement to keep your right to sue Defendant or other released parties for any of the claims resolved by the Settlement.

**19. What happens if I opt out?**

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class. You cannot submit a claim, and you will not receive a payment as part of the Settlement. You will not be bound by the Settlement, releases, or by any further orders or judgments in this case. You will keep the right, if any, to sue on the claims alleged in the case at your own expense.

In addition, if you opt out of the Settlement, you cannot object to this Settlement because the Settlement no longer affects you. If you object to the Settlement and request to exclude yourself, your objection will be voided, and you will be deemed to have excluded yourself.

**COMMENTING ON OR OBJECTING TO THE SETTLEMENT**

**20. How do I tell the Court if I don't like the Settlement?**

If you are a Settlement Class Member and you do not opt out of the Settlement, 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. You cannot ask the Court to change or order a different settlement; the Court can only approve or deny this Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

You may object to any part of the proposed Settlement in writing. If you submit a timely objection confirming your in-person appearance, you may also appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney.

Your objection must be in writing and must

- Clearly identify the case name and number (*Evangelista v. National Student Clearinghouse, et al.*, Case No. 1:23-cv-12993-ADB (D. Mass.));
- Include your full name, address, telephone number, and email address;
- Include the full name, address, telephone number, and email address of your counsel (if you are represented by counsel);
- State whether the objection applies only to you, to a specific subset of the Class, or to the entire Class, and also state the specific grounds for the objection;
- Confirm whether you intend to personally appear and/or testify at the Final Approval Hearing and, if so, whether you are or will be represented by counsel; and
- Provide your signature and the signature of your duly authorized counsel or other duly authorized representative.

Any objection must be either filed electronically with the Court or mailed to the Clerk of Court at the address set forth below. The objection must be filed with the Court—or, if mailed, it must be postmarked—no later than April 25, 2025.

United States District Court for the District of Massachusetts  
Clerk of Court  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 2300  
Boston, MA 02210

**Questions? Go to [NSCSettlement.com](https://www.nscsettlement.com) or call (888) 366-9156**

**21. What's the difference between objecting and opting out?**

Objecting is telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you are a Settlement Class Member and do not opt out of the Settlement. Opting out of the Settlement is telling the Court that you don't want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it does not affect you.

**THE COURT'S FINAL APPROVAL HEARING**

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

The Court will hold a Final Approval Hearing on May 12, 2025, at 10:00 a.m. EDT, in Courtroom 17, 5<sup>th</sup> Floor at the federal courthouse located at 1 Courthouse Way, Boston, Massachusetts 02210, before Judge Allison D. Burroughs. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate; whether to approve Class Counsel's application for attorneys' fees and expenses; and whether to approve the Service Award to the Settlement Class Representative. If there are objections, the Court will consider them. The Court may choose to hear from people who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to the Settlement Class Members. Be sure to check the website, NSCSettlement.com, for updates. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>.

Class Counsel will file a motion for final approval of the Settlement by April 11, 2025. Objectors, if any, must file any response to Class Counsel's motion by April 25, 2025. Responses to any objections and any replies in support of final approval of the Settlement and/or Class Counsel's application for attorneys' fees, costs, and expenses, and Service Award to the Settlement Class Representative will be filed by April 4, 2025.

**23. 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. If you send an objection, you do not have to come to the hearing to talk about it. As long as you mailed or filed your written objection on time, 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 Final Approval Hearing. To do so, you must include a statement in your written objection (see Question 20) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well. You cannot speak at the hearing if you opt out or exclude yourself from the Class.

**IF I DO NOTHING**

**25. What happens if I do nothing at all?**

If you are a Settlement Class Member and do nothing, you will not get any money from this Settlement, and you will not be able to sue the Defendant or other released parties for the claims released by the Settlement Agreement.

**GETTING MORE INFORMATION**

**26. Are more details about the Settlement available?**

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement and other case documents available at NSCSettlement.com, by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Massachusetts, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

**Questions? Go to NSCSettlement.com or call (888) 366-9156**



**27. How do I get more information?**

Visit the website, NSCSettlement.com, where you will find more information, including the Claim Form, a copy of the Settlement Agreement, and answers to questions about the Settlement and other information to help you determine whether you are eligible for a payment.

Contact the Settlement Administrator, Epiq, at (888) 366-9156 or by writing to the following address:

MOVEit National Student Clearinghouse  
Settlement Administrator  
P.O. Box 2878  
Portland, OR 97208-2878

You may also speak with Class Counsel by calling (412) 322-9243 or by writing to the following address:

NSC Class Action  
Lynch Carpenter, LLP  
Attn: Gary F. Lynch 1133 Penn Avenue  
5<sup>th</sup> Floor  
Pittsburgh, PA 15222

**PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE, OR DEFENDANT TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

**Questions? Go to NSCSettlement.com or call (888) 366-9156**

# Attachment 4

Your claim must be submitted online or postmarked by:  
May 26, 2025

**CLAIM FORM FOR NATIONAL STUDENT CLEARINGHOUSE DATA BREACH SETTLEMENT**

*Evangelista v. National Student Clearinghouse et al.*,  
Case No. 1:23-cv-12993-ADB (D. Mass.)

**NATIONAL STUDENT CLEARINGHOUSE**

**USE THIS FORM ONLY IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS TO MAKE A CLAIM FOR IDENTITY THEFT PROTECTION AND CREDIT MONITORING SERVICES AND/OR COMPENSATION FOR UNREIMBURSED LOSSES**

**GENERAL INSTRUCTIONS**

If you were notified by National Student Clearinghouse (“NSC”) that your Social Security number was impacted by the MOVEit Security Incident that resulted from an alleged vulnerability in the third-party file transfer software, MOVEit Transfer (the “Security Incident”), you are a member of the Settlement Class and eligible to complete this Claim Form to request two (2) years of identity protection and credit monitoring services free of charge and **either** (1) compensation for documented unreimbursed out-of-pocket expenses of up to \$2,500 (“Ordinary Losses”)—including up to four (4) hours of lost time at \$25 per hour—and monetary losses up to a total of \$10,000 (“Extraordinary Losses”) **or** (2) an alternative cash payment of \$100 (subject to pro rata reduction or increase based on total claim submission) without the need to prove any loss.

**Ordinary Losses** include the following:

1. Out-of-pocket expenses incurred as a result of the Security Incident, including bank fees, long distance phone charges, cell phone charges (only if charged by the minute), data charges (only if charged based on the amount of data used), postage, or gasoline for local travel;
2. Fees for credit reports, credit monitoring, or other identity theft insurance product purchased on or after May 31, 2023, through May 26, 2025; and
3. Lost Time spent dealing with the Security Incident compensated at a rate of \$25 per hour for up to four (4) hours.

**Extraordinary Losses** include compensation for proven monetary losses, professional fees including attorneys’ fees, accountants’ fees, and fees for credit repair services incurred as a result of the Security Incident.

Compensation for the above losses (except lost time) will only be paid if the following conditions are met:

- The loss is an actual, documented, and unreimbursed monetary loss.
- The loss was more likely than not caused by the Security Incident.
- The loss occurred between May 31, 2023, and May 26, 2025.
- Documentation of the claimed losses is not “self-prepared.” Self-prepared documents, such as handwritten receipts, are, by themselves, insufficient to receive reimbursement.

**Alternative Cash Payment.** In lieu of claiming compensation for Ordinary Losses or Extraordinary Losses, members of the Settlement Class may elect to receive a one-time payment of \$100 (subject to pro rata reduction or increase based on the total number and amount of claim submissions) as a result of the Security Incident.

Claims for the Alternative Cash Payment are subject to potential proration, depending on the number and amount of claims received.

Please read the Claim Form carefully and answer all questions. Failure to provide required information could result in a denial of your claim.

This Claim Form may be submitted electronically *via* the Settlement Website at **NSCSettlement.com** or completed and mailed to the address below. Please type or legibly print all requested information in blue or black ink. Mail your completed Claim Form, including any supporting documentation, by U.S. Mail to the following address:

MOVEit National Student Clearinghouse  
Settlement Administrator  
P.O. Box 2878  
PORTLAND, OR 97208-2878

Questions? Go to [NSCSettlement.com](https://NSCSettlement.com) or call (888) 366-9156

Your claim must be submitted online or postmarked by: May 26, 2025

CLAIM FORM FOR NATIONAL STUDENT CLEARINGHOUSE DATA BREACH SETTLEMENT

Evangelista v. National Student Clearinghouse et al., Case No. 1:23-cv-12993-ADB (D. Mass.)

NATIONAL STUDENT CLEARINGHOUSE

I. CLASS MEMBER NAME AND CONTACT INFORMATION

Provide your name and contact information below. You must notify the Settlement Administrator if your contact information changes after you submit this form.

First Name MI Last Name

Street Address

City State ZIP Code

Email Address

Telephone Number

II. PROOF OF CLASS MEMBERSHIP

Enter the Unique ID Number provided on your Notice:

Unique ID Number

III. IDENTITY THEFT PROTECTION

Check this box if you wish to receive two (2) years of free identity protection and credit monitoring service. You may receive this service even if you previously elected to receive credit monitoring through NSC or another provider.

IV. COMPENSATION FOR ORDINARY LOSSES

Members of the Settlement Class who have spent time dealing with the Security Incident may claim up to four (4) hours for lost time at a rate of \$25 per hour.

Hours claimed (up to 4):

1 Hour 2 Hours 3 Hours 4 Hours

**Your claim must be submitted online or postmarked by: May 26, 2025**

**CLAIM FORM FOR NATIONAL STUDENT CLEARINGHOUSE DATA BREACH SETTLEMENT**

*Evangelista v. National Student Clearinghouse et al.,*  
Case No. 1:23-cv-12993-ADB (D. Mass.)

**NATIONAL STUDENT CLEARINGHOUSE**

Members of the Settlement Class who submit a valid claim using this Claim Form are eligible for reimbursement of the following **documented** out-of-pocket expenses, not to exceed \$2,500 (including Lost Time), as a result of the Security Incident:

Cost Type (Fill all that apply)	Approximate Date of Loss	Amount of Loss
Out-of-pocket expenses incurred as a result of the Security Incident, including bank fees, long distance phone charges, cell phone charges (if charged by the minute), data charges (only if charged based on the amount of data used), postage, or gasoline for local travel.	<input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> MM DD YYYY	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> . <input type="text"/> <input type="text"/>
<b>Examples of Supporting Documentation:</b> <i>Phone bills, gas receipts, postage receipts; list of locations to which you traveled (e.g., police station, IRS office), why you traveled there (e.g., police report or letter from IRS) and number of miles traveled.</i>		
Fees for credit reports, credit monitoring, or other identity theft insurance products purchased on or after May 31, 2023, through May 26, 2025.	<input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> MM DD YYYY	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> . <input type="text"/> <input type="text"/>
<b>Examples of Supporting Documentation:</b> <i>Receipts or account statements reflecting purchases made for Credit Monitoring or Identity Theft Insurance Services.</i>		

**V. COMPENSATION FOR EXTRAORDINARY LOSSES**

Members of the Settlement Class who submit a valid claim using this Claim Form are eligible for reimbursement of the following **documented** extraordinary losses, not to exceed \$10,000, as a result of the Security Incident:

Cost Type (Fill all that apply)	Approximate Date of Loss	Amount of Loss
Other proven monetary losses relating to fraud or identity theft, professional fees including attorneys' fees, accountants' fees, and fees for credit repair services, incurred as a result of the Security Incident.	<input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> MM DD YYYY	\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> . <input type="text"/> <input type="text"/>
<b>Examples of Supporting Documentation:</b> <i>Invoices or statements reflecting payments made for professional fees/services.</i>		

Your claim must be submitted online or postmarked by: May 26, 2025

CLAIM FORM FOR NATIONAL STUDENT CLEARINGHOUSE DATA BREACH SETTLEMENT

Evangelista v. National Student Clearinghouse et al., Case No. 1:23-cv-12993-ADB (D. Mass.)

NATIONAL STUDENT CLEARINGHOUSE

VI. ALTERNATIVE CASH PAYMENT

As an alternative to claiming compensation for Ordinary Losses and Extraordinary Losses above, members of the Settlement Class who submit a valid and timely claim may elect to receive a one-time \$100 payment (subject to pro rata reduction or increase based on the total number and amount of claim submissions) without the need to document losses or attest to time spent as a result of the Security Incident. To claim this alternative cash payment, please check the box below.

NOTE: The alternative cash payment cannot be combined with claims for reimbursement of Ordinary Losses, Lost Time, and Extraordinary Losses. By checking the box below, you will forfeit any other claim for compensation (except Credit Monitoring) included in this Claim Form.

[ ] Check this box if you wish to receive an alternative cash payment of up to \$100.

VII. PAYMENT SELECTION

Please select one of the following payment options, which will be used should you be eligible to receive a settlement payment:

[ ] Electronic Payment - If you select this option, you must provide an email address in the Contact Information section above. You will receive an email at the time of the disbursement from noreply@Epiqpay.com which will allow you to choose your preferred payment option.

[ ] Physical Check - Payment will be mailed to the address provided above.

VIII. MEDICARE BENEFICIARY

[ ] Check here if you were a Medicare beneficiary during the time period of May 31, 2023 to the present.

If you are a Medicare beneficiary receiving more than \$750 under this Settlement, the Settlement Administrator may need to contact you for additional information related to Medicare reporting requirements.

### IX. ATTESTATION & SIGNATURE

By submitting this Claim Form, I certify that I am eligible to make a claim in this Settlement and that the information provided in this Claim Form and any attachments are true and correct. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I understand that this claim may be subject to audit, verification, and Court review and that the Settlement Administrator may require supplementation of this Claim or additional information from me. I also understand that all claims for payments under this Settlement are subject to the availability of settlement funds and may be reduced in part or in whole, depending on the type of claim and the determinations of the Settlement Administrator.

Signature

Date:   -   -      
MM DD YYYY

Printed Name

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: April 11, 2025

/s/ Kristen A. Johnson  
Kristen A. Johnson