

Anderson, et al. v. U-Haul International Inc.
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

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NOTICE OF CLASS ACTION
SETTLEMENT

If you received a notice of Data Incident from U-Haul and resided in California between November 5, 2021, and April 5, 2022, or in December 2023, you are entitled to submit a claim for *Pro Rata Monetary Payment* under a class action Settlement.

www.uhauldatasettlement.com

Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement and Release as defined below.

<<Refnum Barcode>>

Settlement Claim ID: <<Refnum>>

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WHO IS A CLASS MEMBER?

In the Lawsuit *Anderson, et al. v. U-Haul International Inc.*, No. CV-22-01565-PHX-MTL, you are a Settlement Class Member if you resided in the State of California during the Data Incidents that U-Haul International Inc. ("U-Haul") experienced between November 5, 2021 and April 5, 2022, or in December 2023 (the "Settlement Class") and you previously received a notice of Data Incident notifying you of either Data Incident.

WHAT ARE THE SETTLEMENT BENEFITS AND TERMS?

Under the Settlement, U-Haul has agreed to pay \$5,085,000 into a Settlement Fund which will be distributed to Settlement Class Members who submit valid claims, after deducting the Service Awards to the Class Representatives, Class Counsel's attorneys' fees and expenses, and Notice and Settlement Administration Costs, if such deductions are approved by the Court. All Class Members may submit claims to receive *Pro Rata* Monetary Payments estimated to be approximately \$100 if 10% of the roughly 259,300-Person Settlement Class submit valid claims. Claims for the estimated \$100 payment option will be *pro rata* adjusted up or down based on the remaining balance of the Settlement Fund after the deduction of Notice and Settlement Administration Costs, attorneys' fees and expenses, and any Settlement Class Representative Service Awards. U-Haul has also agreed to implement or continue a series of cybersecurity enhancements to limit the likelihood of a future cyberattack. You must timely submit a valid Claim Form to receive compensation from the \$5,085,000 Settlement Fund. More information about submitting a claim for a *Pro Rata* Monetary Payment is available at the Settlement Website.

WHAT ARE YOUR RIGHTS AND OPTIONS?

Submit a Claim Form. To qualify for a monetary payment, you must timely mail a Claim Form that is attached to this Notice or timely complete and submit a Claim Form online at www.uhauldatasettlement.com ("Settlement Website"). Your Claim Form must be postmarked or submitted online no later than **October 15, 2024**. Kroll Settlement Administration LLC is the Settlement Administrator.

Opt-Out. You may exclude yourself from the Settlement and retain your ability to sue U-Haul on your own by mailing a written Opt-Out Request to the Settlement Administrator that is post marked no later than **September 16, 2024**. If you do not exclude yourself, you will be bound by the Settlement and give up your right to sue regarding the Released Claims.

Object. If you do not exclude yourself, you have the right to object to the Settlement. Written objections must be signed, provide the reasons for the

objection, be filed with the Clerk of the Court on or before **September 16, 2024**, and must be mailed to Class Counsel and U-Haul's Counsel with a postmarked date no later than **September 16, 2024**. Please visit the Settlement Website for more details.

Do Nothing. If you do nothing, you will not receive a Settlement payment and will lose the right to sue regarding the Released Claims. You will be bound by the Court's decision because this is a conditionally certified class action.

Attend the Final Approval Hearing. The Court will hold a **Final Approval Hearing on October 23, 2024, at 10:00 a.m. MT where the Court will determine if the Settlement is fair, reasonable, and adequate.** All Persons who timely object to the Settlement by September 16, 2024, may appear at the Final Approval Hearing.

Who are the Class Representatives? Michelle Anderson, Saray Hendricks, Peter Telford, Hulises Rolon, Denise Bowen, Bryan Bowen, Mark Johnson, Gerardo Rivera, and Ariana Allen are the Plaintiffs and Class Representatives in this Lawsuit. They have remained engaged in representing the Class's interests during this litigation and reviewed and approved the terms of the proposed Settlement. Each Plaintiff will seek a Service Award of \$2,000. There are approximately 259,300 Settlement Class Members whose driver's license information may have been impacted in U-Haul's Data Incidents.

Who are the attorneys for the Plaintiffs and the proposed Class? Class Counsel is Terence R. Coates, Markovits, Stock & DeMarco, LLC.

Do I have any obligation to pay attorneys' fees or expenses? No. The attorneys' fees and expenses will be paid exclusively from the Settlement Fund as awarded and approved by the Court. The attorneys' fees will be in an amount not to exceed 30% of the Settlement Fund (*i.e.* no more than \$1,525,500) and the expenses will not exceed \$70,000. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed with the Court.

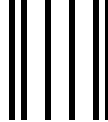
Who is the Judge overseeing this Settlement? Judge Michael T. Liburdi, United States District Judge, District of Arizona.

Where may I locate a copy of the Settlement Agreement, learn more about the case, or learn more about submitting a Claim?

www.uhauldatasettlement.com.

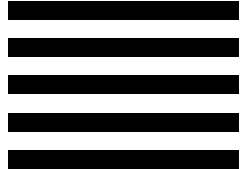
*** If you wish to receive the *Pro Rata* Monetary Payment, the attached tear off Claim Form will suffice. You may also submit a claim online through the Settlement Website. A longer version of the Claim Form may be accessed on the Settlement Website.

This Notice is a summary of the proposed Settlement.



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