

If your Private Information was potentially compromised in a Data Security Incident that took place at Local Union on or around November 17, 2024, you may be eligible for benefits from a class action Settlement.

Fava v. Laborers International Union of North America Local 1184
Superior Court of California, County of Imperial
Case No. ECU004029

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

- A settlement has been reached in a class action lawsuit against Laborers' International Union of North America, Local 1184, ("Local Union" or "Defendant") regarding a cybersecurity incident that resulted in an unauthorized user gaining access to Local Union's systems and discovered by Local Union on or around November 17, 2024 (the "Data Security Incident").
- You are a "Settlement Class Member" if your personal information was accessed in the Data Security Incident and you received notice or a letter regarding the incident on or about March 27, 2025.
- Defendant has agreed to pay up to \$160,000 to settle the claims in this case. All Settlement Class Members are eligible to receive credit monitoring services and cash payments for documented losses up to \$3,500, subject to a pro rata adjustment based upon the total number of valid claims.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights and Options		Deadline
DO NOTHING	You will receive no payment or other benefit and will no longer be able to sue Defendant over the claims resolved in the Settlement. You will remain a member of the Settlement Class and be subject to the terms of the Settlement if approved by the Court.	No Deadline
SUBMIT A CLAIM FORM	The only way to receive a payment or other benefit. Claims must be submitted by January 30, 2026 .	January 30, 2026
EXCLUDE YOURSELF	If you ask to be excluded, you will not receive a payment or other benefit, but you may be able to file your own lawsuit against Defendant, for the same claims. This is the only option that leaves you the potential to file your own lawsuit against Defendant for the claims that are being resolved by the Settlement. To be effective, you must submit a request for exclusion by the deadline.	January 30, 2026
OBJECT	If you do not exclude yourself from the Settlement Class, you may submit an objection telling the Court why you do not like the Settlement. If your objection is overruled, you will be bound by the Settlement.	January 30, 2026

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case must still decide whether to approve the Settlement and the requested attorneys' fees, service awards and costs. No Settlement benefits or payments will be provided unless and until the Court approves the Settlement and it becomes final.

BASIC INFORMATION

1. Why is this Notice being provided?

A court authorized this Notice because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get them.

The Superior Court of California, County of Imperial is overseeing this class action. The case is known as *Fava v. Laborers International Union of North America Local 1184*, Case No. ECU004029 (the “Action”). The people who filed this lawsuit are referred to as the “Plaintiffs” or “Class Representatives,” and the entity sued, Laborers International Union of North America Local 1184 is referred to as “Defendant.”

2. What is this lawsuit about?

The Action arises from a data security incident. On or around November 17, 2024, Local Union discovered that a cybercriminal accessed information on its network. On or around March 27, 2025, Defendant mailed notice of the Data Security Incident Security to Settlement Class Members.

Defendant denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that any law has been violated. Defendant denies all other claims made in the Action. By entering into the Settlement, Defendant is not admitting any wrongdoing.

3. Why is the lawsuit a class action?

In a class action, the Class Representatives sue on behalf of all people who are alleged to have similar claims. Together, in the context of a settlement like this one, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely exclude themselves (opt-out) from the Settlement Class.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree about the claims made in this Action. The Action did not go to trial, and the Court did not decide in Plaintiffs’ or Defendant’ favor. Instead, Plaintiffs and Defendant agreed to settle the Action. Plaintiffs and the attorneys for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members because of the Settlement benefits made available under the Settlement, the risks and uncertainty associated with continued Action, and the nature of the defenses raised by Defendant.

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are a Settlement Class Member if your private information was potentially compromised in the Data Security Incident discovered in November 2024. Defendant previously mailed notice of the Data Security Incident to Settlement Class Members. If you are not sure whether you are a Settlement Class Member, you may contact the Settlement Administrator at 1-888-453-0795 or by emailing LIUNA1184DataSettlement@cptgroup.com.

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are Defendant and their governing board members, governmental entities, the Court, the Court's immediate family, and Court staff, and Settlement Class Members who submit a valid Request for Exclusion.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the settlement website at www.LIUNA1184DataSettlement.com or call the Settlement Administrator's toll-free number at 1-888-453-0795 or by emailing LIUNA1184DataSettlement@cptgroup.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

Defendant has agreed to pay up to an aggregate cap up to \$160,000 to settle the claims in this Action, exclusive of settlement administration costs, service awards and attorney's fees and costs. To the extent the total amount of the Valid Claims exceeds \$160,000 to Settlement Class Members, the Valid Claims shall be decreased in an amount *pro rata*.

If you are a Settlement Class Member and you submit a timely and valid Claim Form, you may be eligible to select one or more of the following settlement benefits:

Credit Monitoring Services: All Settlement Class Members may enroll in one (1) year of Credit Monitoring. Instructions for enrollment will be provided once the Settlement is finally approved.

Compensation for Ordinary Losses: You may submit a timely and valid Claim Form and must provide supporting documentation showing that you spent money or incurred losses fairly traceable to the Data Security Incident for up to \$500 per person.

Ordinary Losses are: (i) Out-of-Pocket Expenses incurred as a result of the Data Security Incident, including, without limitation, out-of-pocket expenses incurred as result of the Incident, including unreimbursed bank fees, unreimbursed card reissuance fees, unreimbursed overdraft fees, unreimbursed charges related to the unavailability of funds, unreimbursed late fees, unreimbursed over-limit fees, unreimbursed charges from banks or credit card companies, reasonable expenses relating to tax remediation efforts, and fees for credit reports, between November 17, 2024 and the date that the Motion for Preliminary Approval is filed (October 8, 2025); (ii) The cost of purchasing credit monitoring or other identity theft insurance products purchased between November 17, 2024 and the date that the Motion for Preliminary Approval is filed (October 8, 2025); and (iii) *Up to 4 hours of time spent*, at \$25 per hour (for a total of up to \$100) for time spent dealing with the Data Security Incident, but only if the time can be documented with reasonable specificity by answering open-ended questions on the Claim Form. Settlement Class Members must submit an attestation that they spent the claimed time responding to issues raised by the Data Security Incident.

Compensation for Extraordinary Losses: You may submit a timely and valid Claim Form for extraordinary losses for up to \$3,500 per person. Extraordinary losses are losses associated with identity theft, fraud, and other actual misuse of personal information, provided that: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the claimant provides proof to the Claims Administrator that that loss was proximately caused by the Data Security Incident; (iii) the claimant made reasonable efforts to avoid the loss or seek reimbursement for the loss, including, but not limited to, exhaustion of all available credit monitoring or identity monitoring insurance; and; (iv) the loss occurred between the date of the Data Security Incident (November 17, 2024) and the date that the Motion for Preliminary Approval is filed (October 8, 2025).

Supporting Documentation: Settlement Class Members claiming losses must submit substantial and plausible documentation supporting their claims. “Self-prepared” documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement for Ordinary Losses or Extraordinary Losses but can be considered to add clarity or support other submitted documentation and a description of how the time was spent.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. Do I need to submit a claim?

If you would like to receive a cash payment under the Settlement, you must submit a Claim Form. If you do not want to give up your right to sue Defendant about the Data Security Incident or the issues raised in this case, you must exclude yourself (or “opt out”) from the Settlement Class. See Question 17 below for instructions on how to exclude yourself. If you wish to object to the Settlement, you must (a) remain a Settlement Class Member (*i.e.*, you may not exclude yourself from the Settlement Class by opting out and also object to the Settlement) and (b) submit a written objection. See Question 20 below for instructions on how to submit an objection.

10. How do I submit a claim for the cash payment?

To receive the settlement benefits you must submit a valid and timely Claim Form to the Settlement Administrator by **January 30, 2026**. You will need your name, address, telephone number, and email address, if applicable, and CPT ID provided in the Notice sent to you, to file a Claim Form.

Claim Forms can be submitted by mail or online at www.LIUNA1184DataSettlement.com. If by mail, the Claim Form must be **postmarked** by **January 30, 2026**. You may request a Claim Form be mailed to you by calling 1-888-453-0795 or by writing to:

Fava v. Laborers International Union of North America Local 1184
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
LIUNA1184DataSettlement@cptgroup.com

11. What am I giving up so as to receive the Cash Payment or to stay in the Settlement Class?

Unless you timely submit a request for exclusion to exclude yourself (opt-out), you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders will apply to you and legally bind you. You will not be able to sue or be part of any other lawsuit against Defendant and Released Parties about the legal issues in the Action that are released by this Settlement. The specific rights you are giving up are called “Released Claims.”

12. What are the Released Claims?

The Settlement Agreement describes the Release, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.LIUNA1184DataSettlement.com, in the public Court records on file in this Lawsuit. You can also request a copy of the Settlement Agreement be mailed to you by calling or writing to the Settlement Administrator. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

13. What happens if my contact information changes after I submit a claim or receive the Postcard Notice?

If you change your mailing address or email address after you submit a Claim Form or after you received the Notice, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by writing to:

Fava v. Laborers International Union of North America Local 1184
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
LIUNA1184DataSettlement@cptgroup.com

14. When will I receive my Settlement Benefits?

If you received notice in the mail, or if you file a timely and valid Claim Form, payment will be provided by the Settlement Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check www.LIUNA1184DataSettlement.com or call the Settlement Administrator or the attorneys in Question 15, below, for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed Scott Edward Cole of Cole & Van Note, 555 12th Street, Ste. 2100, Oakland, CA 94607 as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in the Action.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees and costs not to exceed \$100,000. They will also ask the Court to approve service awards not to exceed \$3,000.00 to each Plaintiff for their service to the Action and for their efforts in achieving the Settlement. If awarded by the Court, attorneys' fees and costs and the service awards will be paid by Defendant. The Court may award less than these amounts.

A copy of Class Counsel's application for attorneys' fees, costs, and service awards will be made available on the settlement website at www.LIUNA1184DataSettlement.com before the deadline for submission of objections. You may also request a copy be mailed to you by calling the Settlement Administrator.

OPTING OUT OF THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue Defendant on your own based on the claims raised in the Action or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from or "opting-out" of the Settlement.

17. How do I get out of the Settlement?

To opt-out of the Settlement, you must mail or email a written notice of intent to opt-out, also referred to as a "Request

for Exclusion" in the Settlement Agreement. The written notice must be signed by you, include your name, mailing address, telephone number, and email address (if any), and clearly state that you wish to be excluded from the Settlement. You cannot exclude yourself by telephone.

The opt-out request must be postmarked by the United States Postal Service and sent to the Settlement Administrator at the following address by January 30, 2026:

Fava v. Laborers International Union of North America Local 1184
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
LIUNA1184DataSettlement@cptgroup.com

18. If I opt out, can I get anything from the Settlement?

No. If you opt out, you are telling the Court you do not want to be part of the Settlement. You can only get Settlement benefits if you stay in the Settlement. If you opt out, do not submit a Claim Form.

19. If I do not opt out, can I sue the Defendants for the same thing later?

No. Unless you opt-out, you give up any right to sue Defendant and Released Parties for the claims this Settlement resolves and releases relating to the Data Security Incident. You must opt-out of the Action to start your own lawsuit against the Defendant or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Settlement or requested attorneys' fees, costs and service awards. You can also give reasons why you think the Court should not approve the Settlement or attorneys' fees, costs and service awards. To object, you must mail timely written notice to the Settlement Administrator as provided below no later than January 30, 2026, stating you object to the Settlement.

The objection must include all the following additional information:

- a. the name of this Action, *Fava v. Laborers International Union of North America Local 1184*, Case No. ECU004029;
- b. the objector's full name, mailing address, telephone number, and email address (if any);
- c. the specific reasons for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;
- d. the number of times the objector has objected to a class action settlement within the 5 years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;
- e. 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 and/or application for attorneys' fees, costs, and service awards;
- f. the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the 5 years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts

- in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding 5 years;
- g. all agreements that relate to the objection or the process of objecting—whether written or oral—between objector or objector's counsel and any other person or entity;
 - h. the identity of all counsel (if any) representing the objector and whether they will appear and address the Court at the Final Approval Hearing;
 - i. a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);
 - j. a statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
 - k. the objector's signature (an attorney's signature is not sufficient).

To be timely, written notice of an objection in the appropriate form must be mailed, postmarked by no later than January 30, 2026, to the Court, Class Counsel, Defendant's Counsel and the Settlement Administrator at the following addresses:

COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL	SETTLEMENT ADMINISTRATOR
Superior Court of California, County of Imperial 939 West Main Street El Centro, CA 92243	Scott Edward Cole Cole & Van Note 555 12th Street Suite 2100 Oakland, CA 94607	Aaron Gibran Haq Lawrence Reich Adell & Cvitan 330 N. Brand Blvd. Suite 250 Glendale, CA 91203	<i>Fava v. Laborers International Union of North America Local 1184</i> c/o CPT Group, Inc. PO Box 19504 Irvine, CA 92623

Any Settlement Class Member who fails to comply with the requirements for objecting as stated in the Settlement Agreement waives and forfeits any and all rights they may have to appear separately and/or to object to the Settlement Agreement and will be bound by all the terms of the Settlement Agreement and by all proceedings, orders and judgments in the Action.

21. What is the difference between objecting and asking to opt out?

Objecting is simply telling the Court you do not like something about the Settlement or requested attorneys' fees, service awards, and costs. You can object only if you stay in the Settlement Class (meaning you do not opt-out of the Settlement). Opting out of the Settlement is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt-out, you cannot object to the Settlement.

THE 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 **March 10, 2026**, at **8:30 a.m.**, before Judge L. Brooks Anderholt at the El Centro Court House, 939 West Main Street, El Centro, CA 92243.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's application for attorneys' fees, costs and expenses, and the service awards to Plaintiffs. If there are objections, the Court will consider them. The Court may also listen to people who have asked to speak at the hearing. You may attend the hearing at your own expense, or you may pay your own lawyer to attend, but it is not necessary.

Note: The date and time of the Final Approval Hearing are subject to change. Any change will be posted at www.LIUNA1184DataSettlement.com.

23. Do I have to attend to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to speak about it. As long as you mail your written objection on time, the Court will consider it.

24. May I speak at the Final Approval Hearing?

Yes, as long as you do not exclude yourself (opt-out), you can (but do not have to) participate and speak for yourself in the Action about the Settlement. This is called making an appearance. You also can have your own lawyer speak for you, but you will have to pay for the lawyer yourself.

If you want to appear, or if you want your own lawyer instead of Class Counsel to speak for you at the hearing, you must follow all of the procedures for objecting to the Settlement listed in Question 20 and specifically include a statement whether you and your counsel (if any) will appear at the Final Approval Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive any Settlement benefits. You will give up rights explained in the “Opting Out from the Settlement” section of this Notice, including your right to start a lawsuit, or be part of any other lawsuit against Defendant or any of the Released Parties about the legal issues in the Action that are released by the Settlement Agreement.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.LIUNA1184DataSettlement.com, by calling 1-888-453-0795 or by writing to:

Fava v. Laborers International Union of North America Local 1184
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
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**PLEASE DO NOT TELEPHONE THE COURT OR ITS
CLERK'S OFFICE REGARDING THIS NOTICE.**