Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

SHUB JOHNS & HOLBROOK LLP
Benjamin F. Johns, PA ID No. 201373
200 Barr Harbor Drive, Suite 400
Conshohocken, PA 19428
(610) 477-8380
bjohns@shublawyers.com

Plaintiffs' Steering Committee Member

LYNCH CARPENTER, LLP
Gerald D. Wells III, PA ID No. 88277
760 Market Street, Suite 600
Philadelphia, PA 19103
(267) 609-6910
jerry@lcllp.com

BAILEY & GLASSER LLP
Bart D. Cohen, PA ID No. 57606
1055 Thomas Jefferson St. NW, Suite 540
Washington, D.C. 20007
(267) 973-4855
bcohen@baileyglasser.com

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA

MELANIE HUDSON, JAMES SMITH, GREGORY MINARCHICK, TAHIRA WASHINGTON, NICHOLAS ZULLO, AND JOSEPH YURCHO, individually and on behalf of all others similarly situated, Plaintiffs, v. **PENNSYLVANIA STATE EDUCATION ASSOCIATION**, Defendant.	CIVIL DIVISION CLASS ACTION Case No. 2025-CV-02411 Hon. Andrew H. Dowling

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Melanie Hudson, James Smith, Gregory Minarchick, Tahira Washington, Nicholas Zullo, and Joseph Yurcho (collectively, "Plaintiffs") respectfully move this Court for an order: (1) granting Final Approval of the proposed Settlement Agreement ("Settlement" or "SA") between Plaintiffs and Defendant Pennsylvania State Education Association ("PSEA" or "Defendant"); and (2) entering final judgment as to the claims raised in this action.[1] In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs incorporate by reference, as if fully set forth herein, the allegations and arguments in Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, and supporting exhibits, filed on March 13, 2026.

2. Plaintiffs incorporate by reference, as if fully set forth herein, the allegations and arguments in Plaintiffs' Motion in Support of Application for Attorneys' Fees, Costs, and Service Awards, and supporting exhibits, filed on June 22, 2026.

3. Plaintiffs submit and explain further in the accompanying brief in support of this motion, that the facts and circumstances surrounding the proposed Settlement have not materially changed since the Court entered its Preliminary Approval Order on March 18, 2026.

4. After the entry of that Order, Plaintiffs and Defendant (collectively, the "Parties") and the approved Settlement Administrator, RG/2 Claims Administration LLC, disseminated Notice to Settlement Class Members in accordance with the Parties' approved Notice Program.

[1] Capitalized terms used herein have the definitions assigned to them in the Settlement Agreement.

5. Plaintiffs submit a detailed description of the results of the Notice plan in the accompanying brief, and in the Declaration of Jessie Montague Regarding Settlement Administration ("Notice Decl."), attached as **Exhibit 1**.

6. The Notice Program has been successfully implemented as of May 4, 2026. Notice was delivered by email or postcard to 499,415 of the 516,016 unique, identified Class Members. This means that, to date, the individual notice efforts have reached over 96.8% of the identified Class Members. This percentage will likely improve as re-mailed notices continue to be delivered. The reach was further enhanced by the Long Form Notice, Publication Notice, a Settlement Website, and a settlement telephone line.

7. The deadline for Class Members to request exclusion from the Settlement, or to file an objection to the Settlement, is July 6, 2026.

8. To date, no Class Members have objected to the Settlement.

9. To date, Class Members have submitted 16 requests for exclusion.

10. If these numbers change as a result of any belated submissions by Class Members, Class Counsel will provide an update to the Court at or prior to the fairness hearing.

11. Class Counsel will appear at the fairness hearing and be prepared to address any questions or concerns from the Court.

12. In further support of this motion, Plaintiffs refer the Court to their attached accompanying brief in support.

WHEREFORE, Plaintiffs respectfully request that the Court, upon completion of the fairness hearing, enter the Parties' proposed Final Order and proposed Judgment, in the forms attached hereto as **Exhibits 2 and 3,** respectively.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Dated: July 6, 2026

Respectfully submitted,



Benjamin F. Johns, PA ID No. 201373
SHUB JOHNS & HOLBROOK LLP
200 Barr Harbor Drive, Suite 400
Conshohocken, PA 19428
(610) 477-8380
bjohns@shublawyers.com

Plaintiffs' Steering Committee Member

LYNCH CARPENTER, LLP
Gerald D. Wells III, PA ID No. 88277
760 Market Street
Suite 600
Philadelphia, PA 19103
(267) 609-6910
jerry@lcllp.com

BAILEY & GLASSER LLP
Bart D. Cohen, PA ID No. 57606
1055 Thomas Jefferson St. NW
Suite 540
Washington, D.C. 20007
(267) 973-4855
bcohen@baileyglasser.com

Interim Co-Lead Class Counsel

Charles E. Schaffer
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
(215) 592-1500
Fax 592-4663
CSchaffer@lfsblaw.com

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Gary Klinger
MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC
227 West Monroe Street Suite 2100
Chicago, Illinois 60606
gklinger@milberg.com

Mark S. Reich
LEVI & KORSINSKY, LLP
33 Whitehall Street, 27th Floor
New York, NY 10004
(212) 363-7500
mreich@zlk.com

Andrew W. Ferich, PA ID No. 313696
AHDOOT & WOLFSON, PC
201 King of Prussia Road | Suite 650
Radnor, Pennsylvania 19087
(310) 474-9111
aferich@ahdootwolfson.com

Marc H. Edelson
EDELSON LECHTZIN LLP
411 S. State Street
Suite N-300
Newtown PA, 18940
215-867-2399
medelson@edelson-law.com

Plaintiffs' Steering Committee

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

CERTIFICATION PURSUANT TO DAUPHIN COUNTY LOCAL RULE 208.2(d)

The undersigned counsel for Plaintiffs certifies that they disclosed the full text of the foregoing motion and proposed order to counsel for Defendant by electronic communication on June 29, 2026. Defendant's counsel concurs with both the foregoing motion and proposed order.

Dated: July 6, 2026

Benjamin F. Johns

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

CERTIFICATE OF SERVICE

AND NOW, this 6th day of July, 2026, I certify, as counsel for Plaintiffs, that I have served on this date a true and correct copy of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, Brief in Support, Proposed Order, and all other supporting documents, upon Defendant via e-mail to their counsel as follows:

Christopher G. Dean
Jeffrey S. Haut
MCDONALD HOPKINS LLC
600 Superior Avenue, East
Suite 2100
Cleveland, OH 44114
cdean@mcdonaldhopkins.com
jhaut@mcdonaldhopkins.com

John B. Consevage
DILWORTH PAXSON LLP
2 N. 2nd Street, Suite 1101
Harrisburg, PA 17101
jconsevage@dilworthlaw.com

Dated: July 6, 2026

Benjamin F. Johns

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit "1"

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

IN THE COURT OF COMMON PLEAS
OF DAUPHIN COUNTY, PENNSYLVANIA

MELANIE HUDSON, JAMES SMITH, GREGORY MONARCHIC, TAHIRA WASHINGTON, NICHOLAS ZULLO, and JOSEPH YURCHO, individually and on On behalf of all others similarly situated, Plaintiffs, v. PENNSYLVANIA STATE EDUCATION ASSOCIATION, Defendant.	CIVIL DIVISION No. 2025-CV-02411

DECLARATION OF JESSIE T. MONTAGUE REGARDING SETTLEMENT ADMINISTRATION

1. My name is Jessie T. Montague, and I am over the age of 18 years. I make this declaration under the penalty of perjury, free and voluntarily, under no coercion, threat, or intimidation, and without promise of benefit or reward, based on my own personal knowledge. If called to testify, I could and would testify consistently with the matters stated herein.

INTRODUCTION

2. I am a Senior Project Manager for RG/2 Claims Administration LLC ("RG/2 Claims"), whose address is 30 South 17th Street, Philadelphia, PA 19103. RG/2 Claims is the independent third-party Settlement Administrator[1] appointed by the Court to handle the settlement administration activities in the above-referenced matter, including, but not limited to, assisting and in the development and administration of the notice plan, as set

[1] All capitalized terms herein have the same meaning as the terms defined in the Settlement Agreement.

forth in detail in this declaration, and administering the claims process set forth in detail in the Settlement Agreement. This Declaration is based upon my personal knowledge and upon information provided to me by Class Counsel or Pennsylvania State Education Association's Counsel, my associates, and RG/2 Claims staff members.

3. RG/2 Claims is a full-service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2 Claims' experience includes the provision of notice and administration services for settlements arising from antitrust, data security breach, consumer, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of $2 billion in class action settlement proceeds.

4. I have been actively involved and responsible for handling the administration of the settlement of the above-referenced matter.

5. RG/2 Claims was retained to, among other tasks, a) prepare, print, mail and email notices to Settlement Class Members; b) create and maintain the Settlement Website; c) prepare weekly activity reports; d) handle inquiries from Settlement Class Members; e) re-mail Notices; f) skip-trace undeliverable addresses; g) receive and process Claim Forms; h) receive and track Opt-Outs and Objections; i) review supporting documentation; j) calculate and issue Settlement Payments to Claimants with approved Claims; and k) conduct such other tasks as the Parties mutually agree or the Court orders RG/2 Claims to perform.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

NOTICE DISSEMINATION

6. On or about March 25, 2026, RG/2 Claims received the Class List from Defendant's Counsel, the electronic file containing the names and known mailing addresses, and email addresses for the individuals identified as Settlement Class Members. RG/2 Claims reviewed the electronic file and determined there were 516,016 unique Settlement Class Members and 511,849 Settlement Class Members with valid contact information.

7. On May 4, 2026, RG/2 Claims caused to be served the Email Notice to the 178,156 Settlement Class Members with a valid email address included on the Class List. Of the Email Notices, 23,117 Email Notices could not be delivered via email. RG/2 Claims promptly mailed a Postcard Notice to the Settlement Class Members with an undeliverable Email Notice. A true and correct copy of the Email Notice is attached hereto as "**Exhibit A**"

8. On May 4, 2026, RG/2 Claims caused to be served by First Class U.S. Mail the Postcard Notice to 333,693 individuals identified as Settlement Class Members without a valid email address. A true and correct copy of the Postcard Notice is attached hereto as "**Exhibit B**."

9. Prior to mailing the Postcard Notice, and in order to provide the best notice practicable and locate the most recent addresses for Settlement Class Members, RG/2 Claims processed the Settlement Class List of 333,693 names and addresses received through the United States Postal Service's ("USPS") National Change of Address database ("NCOA") and updated the data with corrected information.

10. Prior to June 12, 2026, the Notice remailing date, the USPS returned 72,282 Postcard Notices as undeliverable. Of the Postcard Notices returned, 510 included a forwarding address provided by the USPS, and RG/2 Claims promptly mailed a new Postcard Notice to those Settlement Class Members. For the remaining 71,772 Notices, RG/2 Claims performed extensive skip-trace procedures and was able to locate updated addresses for 59,338 Settlement Class Members, RG/2 Claims mailed a new Postcard Notice those 59,338 Settlement Class Members. A total of 12,434 Summary Notices remain undeliverable after skip-trace procedures. As of June 12, 2026, less than 3% of the Postcard Notices sent have been deemed unsuccessfully delivered.

PRESS RELEASE

11. To reach as many Settlement Class Members as possible, RG/2 Claims arranged for the digital Publication Notice to be released on PR Newswire on May 4, 2026. A copy of the PR Newswire press release is attached hereto as **Exhibit "C."**

a. The press release resulted in 571 Exact Match Pick-ups with a Potential Audience of 107,332,312. Exact matches are full text postings of the press release content online and in social media.

b. The sources posting the press release were composed of 70.9% Newspapers and 21% Broadcast Media.

SETTLEMENT WEBSITE

12. On or about May 1, 2026, RG/2 Claims made available the Settlement Website www.pseadatasettlement.com. The website includes the following:

a. The "Homepage" contains a summary of the Settlement and advises the Settlement Class Members of their rights under the Settlement. A copy of the Homepage is attached hereto as "**Exhibit D.**"

b. The "Court Documents" page contains pdf copies of the Consolidated Class Action Complaint, Settlement Agreement, Preliminary Approval Order, Motion for Attorneys' Fees, Costs and Service Awards, and Brief in Support of the Application for Attorneys' Fees, Costs and Expenses, and Service Awards.

c. The "Notice and Claim Form" page contains pdf copies of the Long Form Notice, Claim Form and a link to the online claim filing portal for Settlement Class Members to log in using a Class Member ID and Pin to submit the claim electronically.

d. The "File a Claim" page includes a link to a secure portal where Settlement Class Members can log in using a Class Member ID and Pin to submit the claim electronically.

e. The "Contact Us" page contains the contact information of the Settlement Administrator and Class Counsel.

f. As of June 30, 2026, the settlement website was viewed a total of 20,558 times by 20,509 unique users.

TOLL-FREE NUMBER

13. RG/2 made available and hosted a toll-free number 1-800-465-8066 to allow Settlement Class Members to learn more about the settlement, ask questions about the Settlement and request to have a Long-Form Notice and Claim Form mailed directly

to them. The toll-free number was displayed in the Long-Form Notice, Postcard Notice, Email Notice, Publication Notice and on the Settlement Website. As of June 30, 2026, RG/2 Claims has received 1,003 calls from Settlement Class Members.

SETTLEMENT P.O. BOX

14. RG/2 made available and monitored a settlement mailbox, Post Office Box 59479 in Philadelphia, PA 19102-9479 where Class Members could – and may still – submit hard copy Claim Forms, requests for Claim Forms, exclusion requests, objections, and other case correspondence.

SETTLEMENT EMAIL INBOX

15. RG/2 established and monitored a settlement inbox, PSEADataSettlement@rg2claims.com, where Settlement Class Member could, and may still, learn more about the settlement, ask questions about the Settlement and request to have a Long-Form Notice and Claim Form mailed directly to them and submit a Claim Form. As of June 30, 2026, RG/2 has received 1,025 emails related to the Settlement.

OPT-OUTS & OBJECTIONS

16. The Opt-Out Period for this Settlement is July 6, 2026. To date, RG/2 has received sixteen valid Requests for Exclusion. Attached hereto as **"Exhibit E"** are a list of all persons with valid Requests for Exclusion.

17. The Objection Deadline for this Settlement is July 6, 2026. As of June 30, 2026, RG/2 has not received or been notified of any objections to the settlement.

CLAIMS PROCESSING

18. To date, RG/2 has received and processed 8,374 Claim Forms resulting in a 1.62% claims rate. Of the claims submitted, 62 Settlement Class Members submitted

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

claims for Out-of-Pocket Losses, 7,830 claims were submitted requesting an Alternate Cash Payment and 5,254 claims requested Credit Monitoring. The claims rate is likely to increase as the deadline to file a claim has not yet passed, the information provided regarding claims submission is subject to change and is not final.

SETTLEMENT ADMINISTRATION

19. RG/2 Claims has incurred fees and costs associated with the Settlement Administration thus far and will incur additional costs for resolving the deficiencies, distribution, calculating payments, and responding to Class Member inquiries. To date RG/2 Claims has received payment of invoices in the amount of $179,470 to cover initial costs of settlement administration. RG/2 anticipates that the estimated total cost for its services through completion of the case will be $354,528.

CONCLUSION

20. Based on the total returned Notices to date and the number of remailed notices to date, RG/2 Claims believes the Notice Program reached over 96% of Class Members. This reach is consistent with or better than other effective court-approved settlement notice programs and is designed to meet due process requirements. The FJC's Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (the "FJC Checklist") considers 70-95% reach among class members to be a "high percentage" and reasonable.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Executed on July 6, 2026, at Philadelphia, PA.

Jessie Montague

Jessie T. Montague, Declarant

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit A

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

From: PSEADataSettlement
To:
Subject: Legal Notice: Melanie Hudson, et al. v. Pennsylvania State Education Association, Case No. 2025-CV-02411

Date:
Attachments:

To:
Class Member ID:
PIN:

PLEASE READ THIS NOTICE CAREFULLY.

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

If your Private Information was potentially compromised in a Data Incident announced by the Pennsylvania State Education Association on or around March 18, 2025, you may be eligible for a payment from a proposed class action settlement.

- A proposed Settlement has been reached in a class action lawsuit known as *Melanie Hudson, et al. v. Pennsylvania State Education Association,* Case No. 2025-CV-02411 ("Lawsuit"), filed in the Court of Common Pleas of Dauphin County, Pennsylvania.
- This Lawsuit arises out of unauthorized access to the Pennsylvania State Education Association ("PSEA" or "Defendant") systems and certain files containing sensitive and/or personal information including, but not limited to, full names, addresses, Social Security numbers, driver's license numbers or state IDs, account numbers, account PINs, security codes, passwords and routing numbers, payment card numbers, payment card PINs, payment card expiration dates, passport numbers, taxpayer ID numbers, usernames and passwords, health insurance information, and medical information (collectively "Private Information") occurring on or around July 6, 2024 and which was announced by Defendant on or about March 18, 2025 (the "Data Incident"). Defendant disagrees with Plaintiffs' claims and denies any wrongdoing.
- All Settlement Class Members who submit a Valid Claim can receive the following benefits from the Settlement: two years of credit monitoring, plus either (1) up to $5,000 for documented out-of-pocket expenses, or (2) a cash payment of up to $50.
- You are included in this Settlement as a Settlement Class Member if your Private Information was potentially compromised as a result of the Data Incident, which occurred on or about July 6, 2024, and was announced by Defendant on March 18, 2025.
- Your legal rights are affected regardless of whether you do or do not act.

Who is Included? The Settlement Class includes all natural persons in the United States whose Private Information was potentially compromised as a result of the Data Incident, including those who were sent a notification from Defendant of the Data Incident on or around March 18, 2025.

Excluded from the Settlement Class are (a) all persons who are governing board members of the Defendant; (b) governmental entities; and (c) the Court and any Judge(s) presiding over this matter, the Court's immediate family, and Court staff.

What does the Settlement Provide? The Settlement provides for up to $2,500,000 to pay for (1) Cash Payments for Out-of-Pocket Losses; (2) Alternative Cash Payments; (3) credit monitoring; (4) Settlement Administration Costs; and (5) Court-approved attorneys' fees, costs and Service Awards.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

- **Cash Payment for Out-of-Pocket Losses:** Settlement Class Members may submit a claim for a Cash Payment for Out-of-Pocket losses, not to exceed $5,000 per Settlement Class Member, that were incurred as a result of and are fairly traceable to the Data Incident upon presentation of documentation evidencing such losses. Out-of-Pocket Losses may include, without limitation, the following: (1) unreimbursed costs, expenses, losses, or charges incurred on or after July 6, 2024, as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of a Settlement Class Member's Private Information; (2) costs incurred on or after July 6, 2024, associated with purchasing, accessing, or freezing/unfreezing credit reports with any credit reporting agency; (3) other miscellaneous expenses incurred related to any Out-of-Pocket Loss, such as notary, fax, postage, copying, mileage, internet usage charges (if either charged by the minute or incurred solely as a result of the Data Incident), and long-distance telephone charges and cellphone minutes (if charged by the minute); and (4) credit monitoring, fraud resolution, or other mitigative services or costs that were incurred on or after July 6, 2024, through March 18, 2026.
- **Alternative Cash Payment:** In the alternative to a Cash Payment for Out-of-Pocket Losses, Settlement Class Members may submit a claim for a cash payment of $50 without the need to submit documentation. The amount of the payment is subject to proration based upon the number of Valid Claims filed.
- **Credit Monitoring**: In addition to electing either of the other benefits, Settlement Class Members may claim two (2) years of credit monitoring that will provide proactive credit and identity monitoring, personalized recovery assistance, and reimbursement for expenses.

How To Get Benefits? You must complete and file a Claim Form online or by mail postmarked by **July 6, 2026**, including required supporting documents if you choose a Cash Payment for Out-of-Pocket Losses. You can file your claim online at www.PSEADataSettlement.com. To file online, your unique Class Member ID and PIN are required to access the form. You may also get a paper Claim Form on the Settlement Website, or by calling the toll-free number 800-465-8066, and submitting it by mail to PSEA Data Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

Class Member ID: **PIN:**

What Are My Other Options? If you stay in the Settlement Class, you will be legally bound by the Settlement's terms and you will release your claims against PSEA and the other Released Parties, regardless of whether you file a claim.
If you do not want to be legally bound by the terms of the Settlement, you must exclude yourself by **July 6, 2026**. If you do not exclude yourself, you will be bound by the terms of this Settlement Agreement and you will release any claim you may have (as defined in the Settlement Agreement) related to the Data Incident, as more fully described in the Settlement Agreement and Long Form Notice, available on the Settlement Website at www.PSEADataSettlement.com.
If you want to tell the Court that you do not agree with the proposed Settlement or some part of it, you can submit an objection telling the Court why you do not think the Settlement should be approved. Objections must be submitted in writing by **July 6, 2026**. Instructions on how to submit a written objection can be found in the Settlement Agreement and Long Form Notice on the website at www.PSEADataSettlement.com.

The Final Approval Hearing: The Court will hold a Final Approval Hearing on July 27, 2026 at 9:30 a.m. ET before the Honorable Judge Andrew H. Dowling of the Court of Common Pleas of Dauphin County, 101 Market St., Harrisburg, PA 17101, to consider: whether to approve the Settlement, service awards, attorneys' fees and litigation expenses, as well as any objections. You or your attorney may request to appear at the hearing, but you are not required to do so. The hearing may be held remotely, so please check the Settlement Website for those details.

You are encouraged to review the Long Form Notice. To review the Long Form Notice, review other important documents, including the Settlement Agreement, and obtain more

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

information about the proposed Settlement, please visit www.PSEADataSettlement.com.

If you have any questions, you can contact the Settlement Administrator by calling toll-free 800-465-8066 or by emailing **PSEADataSettlement@rg2claims.com**.

Click here to unsubscribe

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit B

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Legal Notice

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

MELANIE HUDSON, ET AL.
V.
PENNSYLVANIA STATE EDUCATION ASSOCIATION
CASE NO. 2025-CV-02411

If your Private Information was potentially compromised as a result of a Data Incident announced by the Pennsylvania State Education Association on March 18, 2025, you may be eligible for a payment from a proposed class action settlement.

Learn More At:
www.PSEADataSettlement.com

PSEA Data Settlement
c/o RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
MAG

Electronic Service Requested

NUMERIC EQUIVALENT

Postal Service: Please do not mark barcode

Class Member ID: ‹‹Class Member ID››
PIN: ‹‹PIN››

‹‹FirstName››‹‹LastName››
‹‹Address1››
‹‹Address2››
‹‹City››, ‹‹State›› ‹‹Zip››
‹‹Country››

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Class Member ID: ‹‹Class Member ID›› PIN: ‹‹PIN››

A proposed Settlement has been reached with Pennsylvania State Education Association ("Defendant") for claims arising out of a data incident. On or about July 6, 2024, an unauthorized third party potentially gained access to the Defendant's network and certain individuals' Private Information (the "Data Incident").

Who is Included? The Settlement Class includes all natural persons in the United States whose Private Information was potentially compromised as a result of the Data Incident, including those who were sent a notification from Defendant of the Data Incident on or around March 18, 2025.

What does the Settlement Provide? The Settlement provides for up to $2,500,000 to be used to pay for (1) compensation for Out-of-Pocket Losses; (2) Alternative Cash Payments; (3) credit monitoring; (4) Settlement Administration Costs; and (5) Court-approved attorneys' fees, costs and Service Awards.

- **Out-Of-Pocket Losses:** Settlement Class Members may submit a claim of up to $5,000 for documented unreimbursed losses or expenditures incurred that are fairly traceable to the Data Incident, with presentation of documentation evidencing such losses; or
- **Alternative Cash Payment:** In the alternative to a Cash Payment for Out-of-Pocket Losses, Settlement Class Members may submit a claim for an Alternative Cash Payment of $50, which amount is subject to proration based upon the number of Valid Claims filed; and
- **Credit Monitoring:** In addition to electing either of the other benefits, Settlement Class Members may claim two years of credit monitoring that will provide proactive credit and identity monitoring, personalized recovery assistance, and reimbursement for expenses.

How To Get Benefits: You must complete and file a Claim Form online or by mail postmarked by **July 6, 2026**, including required supporting documents if you choose a Cash Payment for Out-of-Pocket Losses. You can file your claim online through the Settlement Website at **www.PSEADataSettlement.com**. Your unique Class Member ID and PIN are required to access the form to file online. You may also get a paper Claim Form on the Settlement Website, or by calling the toll-free number 800-465-8066, and submit it by mail to PSEA Data Settlement, c/o RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479.

What Are My Other Options? If you stay in the Settlement Class, you will be legally bound by the Settlement's terms and you will release your claims against Defendant and the other Released Parties, regardless of whether you file a claim. If you do not want to be legally bound by the terms of the Settlement, you must exclude yourself by **July 6, 2026**. If you do not exclude yourself, you may object to the Settlement by **July 6, 2026**, as more fully described in the Settlement Agreement, available on the Settlement Website.

The Final Approval Hearing: The Court will hold a Final Approval Hearing on **July 27, 2026 at 9:30 a.m. ET** before the Honorable Judge Andrew H. Dowling of the Court of Common Pleas of Dauphin County, 101 Market St., Harrisburg, PA 17101, to consider: whether to approve the Settlement, Service Awards, attorneys' fees and costs, as well as any objections. You or your attorney may request to appear at the hearing, but you are not required to do so. The hearing may be held remotely, so please check the Settlement Website for those details.

For more information, please visit **www.PSEADataSettlement.com** or call toll-free **800-465-8066** or email **PSEADataSettlement@rg2claims.com**

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit C

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Summary of Court Approved Legal Notice for Pennsylvania State Education Association Data Incident Settlement

NEWS PROVIDED BY
RG/2 CLAIMS ADMINISTRATION LLC →
May 04, 2026, 14:00 ET

PHILADELPHIA, May 4, 2026 /PRNewswire/ -- The following release was issued by RG/2 Claims Administration LLC, as Settlement Administrator.

If Your Private Information Was Potentially Compromised in a Data Incident Announced by the Pennsylvania State Education Association on March 18, 2025, You May be Eligible for Benefits from a Class Action Settlement.

A proposed Settlement has been reached in a class action lawsuit known as *Melanie Hudson, et al. v. Pennsylvania State Education Association*, Case No. 2025-CV-02411 (the "Action"), filed in the Court of Common Pleas of Dauphin County, Pennsylvania. The Action arises out of unauthorized access to the Pennsylvania State Education Association ("PSEA" or "Defendant") systems and certain files containing sensitive and/or personal information (collectively "Private Information") that occurred on or around July 6, 2024, and that was announced by Defendant on or about March 18, 2025 (the "Data Incident"). The Plaintiffs allege that the Data Incident was a result of Defendant's failure to use reasonable data security measures. Defendant denies Plaintiffs' claims, and further denies any wrongdoing or liability.

The proposed Settlement may affect your rights. For comprehensive information about the lawsuit and settlement, including the longer notice of Settlement and the Settlement Agreement with the precise terms and conditions of the Settlement, please see **www.PSEADataSettlement.com** or call 800-465-8066.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

The Settlement Class includes all natural persons in the United States whose Private Information was potentially compromised as a result of the Data Incident, including those who were sent a notification from Defendant of the Data Incident on or around March 18, 2025. If you are a member of the Settlement Class, the mailed Legal Notice should be arriving shortly. If you believe you are a Settlement Class Member, you can contact the Settlement Administrator at 800-465-8066 to obtain more information. If you are a Settlement Class Member, you may be able to receive one of the following Settlement Benefits:

- **Out-Of-Pocket Losses:** Settlement Class Members may submit a claim for reimbursement of up to $5,000 cash for documented unreimbursed losses or expenditures incurred that are fairly traceable to the Data Incident, with presentation of documentation evidencing such losses; or
- **Alternative Cash Payment:** In the alternative to a Cash Payment for Out-of-Pocket Losses, Settlement Class Members may submit a claim for an Alternative Cash Payment of $50, which amount is subject to proration based upon the number of Valid Claims filed; and
- **Credit Monitoring*:*** In addition to electing either of the other benefits, Settlement Class Members may also claim two years of credit monitoring that will provide proactive credit and identity monitoring, personalized recovery assistance, and reimbursement for expenses.

You must complete and file a Claim Form online or by mail postmarked by **July 6, 2026**, including required supporting documents to receive Settlement Benefits. Please see **www.PSEADataSettlement.com** or call 800-465-8066 for a copy of the claim form. To file online, you need a unique Class Member ID. If you don't have a unique Class Member ID, you may file a claim only by mail.

If you do not want to be legally bound by the terms of the Settlement, you must exclude yourself by **July 6, 2026**. If you do not exclude yourself, you may object to the Settlement by **July 6, 2026**, as more fully described in the Settlement Agreement, available on the Settlement Website.

The Court will hold a Final Approval Hearing on July 27, 2026, at 9:30 a.m. ET before the Honorable Judge Andrew H. Dowling of the Court of Common Pleas of Dauphin County to consider whether to approve the Settlement, Service Awards, attorneys' fees and costs, as well as any objections. The hearing may be held remotely, so please check the Settlement Website for those details.

BY ORDER OF THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA.

A Court has authorized this Notice.

SOURCE: Settlement Administrator, RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479, Telephone 800-465-8066, Facsimile 215-827-5551, Settlement, PSEADataSettlement@rg2claims.com.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit D

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Melanie Hudson, et al. v. Pennsylvania State Education Association

Case No. 2025-CV-02411

If Your Private Information Was Potentially Compromised in a Data Incident Announced by the Pennsylvania State Education Association on March 18, 2025, You May Be Eligible for Benefits from a Class Action Settlement.

WHAT IS THIS LAWSUIT ABOUT?

A proposed Settlement has been reached in a class action lawsuit known as *Melanie Hudson, et al. v. Pennsylvania State Education Association,* Case No. 2025-CV-02411 ("Lawsuit"), filed in the Court of Common Pleas of Dauphin County, Pennsylvania. This Lawsuit arises out of unauthorized access to the Pennsylvania State Education Association ("PSEA" or "Defendant") systems and certain files containing sensitive and/or personal information including, but not limited to, full names, addresses, Social Security numbers, driver's license numbers or state IDs, account numbers, account PINs, security codes, passwords and routing numbers, payment card numbers, payment card PINs, payment card expiration dates, passport numbers, taxpayer ID numbers, usernames and passwords, health insurance information, and medical information (collectively "Private Information") occurring on or around July 6, 2024 and which was announced by Defendant on or about March 18, 2025 (the "Data Incident"). Defendant disagrees with Plaintiffs' claims and denies any wrongdoing.

WHO IS INCLUDED?

The Settlement Class includes all natural persons in the United States whose Private Information was potentially compromised as a result of the Data Incident, including those who were sent a notification from Defendant of the Data Incident

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

on or around March 18, 2025.

Excluded from the Settlement Class are (a) all persons who are governing board members of the Defendant; (b) governmental entities; and (c) the Court and any Judge(s) presiding over this matter, the Court's immediate family, and Court staff.

WHAT DOES THE SETTLEMENT PROVIDE?

The Settlement provides for up to $2,500,000 to pay for (1) Cash Payments for Out-of-Pocket Losses; (2) Alternative Cash Payments; (3) credit monitoring; (4) Settlement Administration Costs; and (5) Court-approved attorneys' fees, costs and Service Awards.

Cash Payment for Out-of-Pocket Losses: Settlement Class Members may submit a claim for a Cash Payment for Out-of-Pocket losses, not to exceed $5,000 per Settlement Class Member, that were incurred as a result of and are fairly traceable to the Data Incident upon presentation of documentation evidencing such losses. Out-of-Pocket Losses may include, without limitation, the following: (1) unreimbursed costs, expenses, losses, or charges incurred on or after July 6, 2024, as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of a Settlement Class Member's Private Information; (2) costs incurred on or after July 6, 2024, associated with purchasing, accessing, or freezing/unfreezing credit reports with any credit reporting agency; (3) other miscellaneous expenses incurred related to any Out-of-Pocket Loss, such as notary, fax, postage, copying, mileage, internet usage charges (if either charged by the minute or incurred solely as a result of the Data Incident), and long-distance telephone charges and cellphone minutes (if charged by the minute); and (4) credit monitoring, fraud resolution, or other mitigative services or costs that were incurred on or after July 6, 2024, through March 18, 2026.

Alternative Cash Payment: In the alternative to a Cash Payment for Out-of-Pocket Losses, Settlement Class Members may submit a claim for a cash payment of $50 without the need to submit documentation. The amount of the payment is subject to proration based upon the number of Valid Claims filed.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
[illegible]

Credit Monitoring: In addition to electing either of the other benefits, Settlement Class Members may claim two (2) years of credit monitoring that will provide proactive credit and identity monitoring, personalized recovery assistance, and reimbursement for expenses.

HOW TO GET BENEFITS?

You must complete and file a Claim Form online or by mail postmarked by **July 6, 2026**, including required supporting documents if you choose a Cash Payment for Out-of-Pocket Losses. You can file your claim online here. (https://www.claimsettlementportal.com/PSEA)

If you are a Settlement Class Member, your legal rights are affected regardless of whether you do or do not act. You have the following options:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
YOUR OPTIONS	**INSTRUCTIONS**
Do Nothing	If you stay in the Settlement Class, you will be legally bound by the Settlement's terms and you will release your claims against PSEA and the other Released Parties, regardless of whether you file a claim.
Submit a Claim	**You must submit a Valid Claim to get money from this Settlement.** Claim Forms must be submitted online by **July 6, 2026,** if mailed, postmarked no later than **July 6, 2026.**
Exclude Yourself	**Get out of the Settlement. Get no money. Keep your rights.** This is the only option that allows you to keep your right to sue as to the claims in this lawsuit. You will not get any money from the Settlement. Your request to exclude yourself must be received no later than **July 6, 2026.** Please see question 10 of the Long Form Notice for details on how to exclude yourself from the settlement.
File an Objection	Stay in the Settlement but tell the Court why you think the Settlement should not be approved. Objections must be postmarked no later than **July 6, 2026.** Please see question 15 of the Long Form Notice for details on how to object to the settlement.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. The Final Approval Hearing is scheduled for **July 27, 2026 at 9:30 a.m. ET**

To understand all your options and how your rights will be affected, as well as the deadlines for action on your part, please read the Long Form Notice. (pdf/PSEA_Long_Form_Notice _FINAL.pdf)

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold the Final Approval Hearing on July 27, 2026 at 9:30 a.m. ET at the Court of Common Pleas of Dauphin County, 101 Market St., Harrisburg, PA 17101. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check this Settlement Website for updated information.

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, adequate, and is in the best interests of Settlement Class Members, and if it should be approved. If there are valid objections, the Court will consider them and will listen to people who have asked to speak at the hearing if the request was made properly. The Court will also consider the Application for Attorneys' Fees, Costs and Service Awards to Class Counsel and the Class Representatives.

© 2026

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit E

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Row	ClaimNumber	FirstName	MiddleName	LastName
1	PSE000500000	GERALD		MCDONALD
2	PSE000500001	DEBRA	A.	MCDONALD
3	PSE000500002	GORDON	A.	PLATE
4	PSE000500003	LINDA	JO	DAVID
5	PSE000500004	KEVIN		SIMMONS
6	PSE000500005	BETH		SIMMONS
7	PSE000500006	ELAINE	M.	VENUTI
8	PSE000500007	KAREN		MARAVICH
9	PSE000500008	PARASKEVE	E.	CHARKALIS
10	PSE000500009	MICHELLE	M.	BRENNER
11	PSE000500010	CONNIE		MEYER
12	PSE000500011	SUZANNE		LE LAN
13	PSE000500012	PATRICIA	J.	PINTO- PYRAH
14	PSE000500013	CARL	A.	HOOK
15	PSE000500014	BARBARA		REGENSBURG
16	PSE000500015	VIRGINIA	P.	D'ANTONIO

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit "2"

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

SHUB JOHNS & HOLBROOK LLP
Benjamin F. Johns, PA ID No. 201373
200 Barr Harbor Drive, Suite 400
Conshohocken, PA 19428
(610) 477-8380
bjohns@shublawyers.com

Plaintiffs' Steering Committee Member

LYNCH CARPENTER, LLP
Gerald D. Wells III, PA ID No. 88277
760 Market Street, Suite 600
Philadelphia, PA 19103
(267) 609-6910
jerry@lcllp.com

BAILEY & GLASSER LLP
Bart D. Cohen, PA ID No. 57606
1055 Thomas Jefferson St. NW, Suite 540
Washington, D.C. 20007
(267) 973-4855
bcohen@baileyglasser.com

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA

MELANIE HUDSON, JAMES SMITH, GREGORY MINARCHICK, TAHIRA WASHINGTON, NICHOLAS ZULLO, AND JOSEPH YURCHO, individually and on behalf of all others similarly situated, Plaintiffs, v. **PENNSYLVANIA STATE EDUCATION ASSOCIATION**, Defendant.	CIVIL DIVISION CLASS ACTION Case No. 2025-CV-02411 Hon. Andrew H. Dowling

[PROPOSED] ORDER GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT

WHEREAS, on March 18, 2026, a Preliminary Approval Order was entered by the Court preliminarily approving the proposed Settlement pursuant to the terms of the Parties' Settlement Agreement, and directing that Notice be given to the Settlement Class.

WHEREAS, pursuant to the notice requirements set forth in the Settlement Agreement and in the Preliminary Approval Order, the Settlement Class was notified of the terms of the proposed Settlement, of the right of members of the Settlement Class to object or opt-out, and of the right of members of the Settlement Class to be heard at a Final Approval Hearing to determine, *inter alia*: (1) whether the terms and conditions of the Settlement Agreement are fair, reasonable, and adequate for the release of the claims contemplated by the Settlement Agreement; and (2) whether the Final Approval Order and Judgment should be entered dismissing this Action with prejudice.

WHEREAS, a Final Approval Hearing was held on July 27, 2026. Settlement Class Members were notified of their right to appear at the Final Approval Hearing in support of or in opposition to the proposed Settlement, the award of attorneys' fees, costs, and expenses to Class Counsel, and requested Service Awards to Class Representatives and Unnamed Plaintiffs.

NOW, THEREFORE, the Court having heard the presentation of Class Counsel and counsel for Defendant, having reviewed all of the submissions presented with respect to the proposed Settlement, having determined that the Settlement is fair, reasonable, and adequate, having considered the application for attorneys' fees, expenses, and costs made by Class Counsel and the application for Service Awards to the Class

Representatives and Unnamed Plaintiffs, and having reviewed the materials in support thereof, and good cause appearing,

THIS COURT FINDS AND ORDERS AS FOLLOWS:

1. The capitalized terms used in this Final Approval Order shall have the same meaning as defined in the Settlement Agreement except as may otherwise be ordered.

2. The Court has jurisdiction over the subject matter of this action and over all claims raised therein and all parties thereto, including the Settlement Class.

3. The Court hereby approves the Settlement, including the plans for implementation and distribution of the Settlement Benefits, and finds that the Settlement is, in all respects, fair, reasonable, and adequate to the Settlement Class Members, within the authority of the Parties and the result of extensive arm's-length negotiations. The Parties shall effectuate the Settlement Agreement in accordance with its terms. The Settlement Agreement and every term and provision thereof shall be deemed incorporated herein as if explicitly set forth and shall have the full force of an Order of this Court.

4. There are no objections to, and 16 opt-outs from the Settlement. Those Settlement Class Members who timely and properly opted out from the Settlement are identified in **Exhibit 1** to this order.

5. The Settlement Class, which will be bound by this Final Approval Order, shall include all members of the Settlement Class who did not submit timely and valid requests to be excluded from the Settlement Class.

6. For purposes of the Settlement and this Final Approval Order, the Court hereby:

a. certifies the following Settlement Class pursuant to Pa. R. Civ. P. 1702: All natural persons in the United States whose Private Information was potentially compromised as a result of the Data Incident, including those who were sent a notification from Defendant of the Data Incident. Excluded from the Settlement Class are: (a) all persons who are governing board members of the Defendant; (b) governmental entities; and (c) the Court and any Judge(s) presiding over this matter, the Court's immediate family, and Court staff.

b. appoints Plaintiffs Melanie Hudson, James Smith, Gregory Minarchick, Tahira Washington, Nicholas Zullo, and Joseph Yurcho, for settlement purposes only, as the representatives of the Settlement Class. The Court finds that the Class Representatives are similarly situated to absent Settlement Class Members and are typical of the Settlement Class, and, therefore, will be adequate Class Representatives.

c. appoints Gerald D. Wells III of Lynch Carpenter and Bart D. Cohen of Bailey Glasser LLP as Class Counsel; and

d. finds that the dissemination of Notice to Settlement Class Members: (1) was implemented in accordance with the Preliminary Approval Order; (2) constituted the best notice practicable under the circumstances; (3) constituted notice that was reasonably calculated, under the circumstances, to apprise Class Members of (a) a description of the material terms of the Settlement; (b) how to submit a Claim Form; (c) the Claim Form Deadline; (d) the last day of the Opt-Out Period for individuals in the Settlement Class to opt-out of the Settlement Class; (e) the deadline for Settlement Class Members to object to the Settlement and/or

Application for Attorneys' Fees, Costs and Service Awards; (f) the Final Approval Hearing date; and (g) the Settlement Website address at which Settlement Class members may access the Settlement Agreement and other related documents and information; (4) constituted due, adequate, and sufficient notice to all natural persons entitled to receive notice of the proposed Settlement; and (5) satisfied the requirements of Pa. R. Civ. P. 1714, the Constitution of the United States (including the Due Process Clause), and all other applicable laws and rules.

7. All persons who have not made their objections to the Settlement in the manner provided in the Settlement Agreement are deemed to have waived any objections by appeal, collateral attack, or otherwise.

8. Within the time periods set forth in the Settlement Agreement, the Settlement Benefits provided for by the Settlement Agreement shall be paid to the Settlement Class Members who have submitted valid Claim Forms, pursuant to the terms and conditions of the Settlement Agreement.

9. Upon the Effective Date, the Releasing Parties who did not validly and timely opt-out shall, by operation of this Final Approval Order, have fully, finally, and forever released, relinquished and discharged the Released Parties from all claims that were or could have been asserted in this Action.

10. All Settlement Class Members who did not validly and timely opt-out are hereby permanently barred and enjoined from filing, commencing, prosecuting, maintaining, intervening in, participating in, conducting or continuing, either directly or in any other capacity, any action or proceeding in any court, agency, arbitration, tribunal or

jurisdiction, asserting any claims against the Released Parties pursuant to the Settlement Agreement.

11. The terms of the Settlement Agreement and this Final Approval Order shall have maximum *res judicata*, collateral estoppel, and all other preclusive effect in any and all claims for relief, causes of action, suits, petitions, demands in law or equity, or any allegations of liability, damages, debts, contracts, agreements, obligations, promises, attorneys' fees, costs, interest or expenses which were or could have been asserted in this Action or in any third-party action.

12. The Final Approval Order, the Settlement Agreement, the Settlement which it reflects, and all acts, statements, documents, or proceedings relating to the Settlement are not, and shall not be construed as, or used as an admission by or against Defendant of any fault, wrongdoing, or liability on the part of Defendant or of the validity or certifiability for litigation of any claims.

13. The Court finds that Service Awards of $1,500 for the Class Representatives, and $500 for the Unnamed Plaintiffs are fair and reasonable. These amounts are to be paid in accordance with the Settlement Agreement.

14. The Court hereby approves an award of attorneys' fees in an amount of $_____ and litigation costs and expenses in an amount of $_____. These amounts are to be paid in accordance with the Settlement Agreement. The Court finds these amounts to be fair and reasonable pursuant to the non-exclusive factors set forth in Pa. R. Civ. P. 1716 to determine a reasonable fee in a class action. Specifically, the Court finds:

a. Class Counsel and other attorneys expended significant time and resources in the prosecution of this case, warranting a contingency fee payment.

b. Class Counsel and other attorneys are experienced in the fields of class actions and data breach cases and possessed the experience, skills, and reputations to achieve the results secured.

c. This Settlement reflects a significant monetary recovery for the Settlement Class which could not have occurred without the diligence and hard work of Class Counsel and is an excellent result.

d. This was a novel and complex case involving data breach claims and law.

e. Class Counsel undertook the significant risk of no recovery and had to forego other lucrative work to prosecute this case on behalf of the Settlement Class.

15. There were no objections to the Settlement.

16. The above-captioned Action is hereby dismissed against Defendant in its entirety, with prejudice. Except as otherwise provided in this Final Approval Order, the parties shall bear their own costs and attorneys' fees. Without affecting the finality of the Judgment entered, the Court reserves jurisdiction over the implementation of the Settlement, including enforcement and administration of the Settlement Agreement.

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

IT IS SO ORDERED, ADJUDGED, AND DECREED this __ day of _____, 2026.

BY THE COURT:

_____
Andrew H. Dowling, Judge

Distribution:
Benjamin F. Johns
Samantha E. Holbrook
SHUB JOHNS & HOLBROOK LLP
Four Tower Bridge
200 Barr Harbor Drive | Suite 400
Conshohocken, PA 19428
(610) 477-8380
bjohns@shublawyers.com
sholbrook@shublawyers.com

Bart D. Cohen
BAILEY & GLASSER LLP
1055 Thomas Jefferson St. NW
Suite 540
Washington, D.C. 20007
(267) 973-4855
bcohen@baileyglasser.com

Attorneys for Plaintiff Melanie Hudson

Charles E. Schaffer
Nicholas J. Elia
LEVIN SEDRAN & BERMAN LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
(215) 592-1500
cschaffer@lfsblaw.com
nelia@lfsblaw.com

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

David K. Lietz
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
5335 Wisconsin Avenue NW
Washington, D.C. 20015-2052
(866) 252-0878
dlietz@milberg.com

Attorneys for Plaintiff Robert Twaddell

Patrick Howard
SALTZ MONGELUZZI BENDESKY P.C.
1650 Market Street
One Liberty Place, 52nd Floor
Philadelphia, PA 19103
(215) 575-3895
phoward@smbb.com

Samuel J. Strauss
Raina Borelli
STRAUSS BORRELLI PLLC
980 N. Michigan Avenue, Suite 1610
Chicago, IL 60611
(872) 263-1100
sam@straussborrelli.com
raina@straussborrelli.com

Attorneys for Plaintiff Gregory Minarchick

Gerald D. Wells III
LYNCH CARPENTER
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
(412) 322-9243
jerry@lcllp.com

Courtney Maccarone
Mark Svensson
LEVI & KORSINSKY, LLP
33 Whitehall Street, 17th Floor
New York, NY 10004
(212) 363-7500
cmaccarone@zlk.com
msvensson@zlk.com

Attorneys for Plaintiff Audrey Plassio

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Kenneth J. Grunfeld
KOPELOWITZ OSTROW
FERGUSON WEISELBERG GILBERT
65 Overhill Road
Bala Cynwyd, PA 19004
Tel.: (954) 525-4100
grunfeld@kolawyers.com

Gary E. Mason
Danielle L. Perry
Lisa A. White
MASON LLP
5335 Wisconsin Avenue, NW, Suite 640
Washington, DC 20015
Tel.: (202) 429-2290
gmason@masonllp.com

Attorneys for Plaintiff Tara Dusko

Andrew W. Ferich
AHDOOT & WOLFSON, PC
201 King of Prussia Road, Suite 650
Radnor, PA 19087
(310) 474-9111
aferich@ahdootwolfson.com

Attorneys for Plaintiff Joseph Yurcho

William B. Federman
Tanner R. Hilton
FEDERMAN & SHERWOOD
10205 North Pennsylvania Avenue
Oklahoma City, OK 73120
Telephone: (405) 235-1560
4131 North Central Expressway, Suite 900
Dallas, Texas 75204
wbf@federmanlaw.com
trh@federmanlaw.com

Attorneys for Plaintiff Tahira Washington

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Andrew W. Ferich
AHDOOT & WOLFSON, PC
201 King of Prussia Road, Suite 650
Radnor, PA 19087
(310) 474-9111
aferich@ahdootwolfson.com

Attorney for Plaintiff Carol Blount

Amber L. Schubert
SCHUBERT JONCKHEER & KOLBE LLP
2001 Union Street, Suite 200
San Francisco, CA 94123
(415) 788-4220
aschubert@sjk.law

Attorney for Plaintiff Annette Eubank

Marc H. Edelson
EDELSON LECHTZIN LLP
411 S. State Street, Suite N300
Newtown, PA 18940
(215) 867-2399
medelson@edelson-law.com

Attorney for Plaintiff Nicholas Zullo

John B. Consevage
DILWORTH PAXSON LLP
2 N. 2nd Street, Suite 1101
Harrisburg, PA 17101
(717) 213-4105
jconsevage@dilworthlaw.com

Christopher G. Dean
Jeffrey S. Haut
MCDONALD HOPKINS LLC
600 Superior Avenue, East
Suite 2100
Cleveland, OH 44114
cdean@mcdonaldhopkins.com
jhaut@mcdonaldhopkins.com

Attorneys for Defendant Pennsylvania State Education Association

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

Exhibit "3"

Dauphin County Prothonotary E-Filed - 06 Jul 2026 04:43:52 PM
Case Number: 2025-CV-02411

IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA

MELANIE HUDSON, JAMES SMITH, GREGORY MINARCHICK, TAHIRA WASHINGTON, NICHOLAS ZULLO, AND JOSEPH YURCHO, individually and on behalf of all others similarly situated, Plaintiffs, v. **PENNSYLVANIA STATE EDUCATION ASSOCIATION**, Defendant.	CIVIL DIVISION CLASS ACTION Case No. 2025-CV-02411 Hon. Andrew H. Dowling

[PROPOSED] JUDGMENT

On _____, 2026, the Court granted Plaintiffs' Motion for Final Approval of the Class Action Settlement with Defendant Pennsylvania State Education Association (the "Order"), approving the Settlement Agreement, dismissing the Action with prejudice, approving Plaintiffs' Application for Attorneys' Fees, Costs, and Service Awards to the Class Representatives and Unnamed Plaintiffs, and reserving jurisdiction as set forth in the Order and Settlement Agreement. Judgment is hereby entered in accordance with, and incorporating, the Order and the Settlement Agreement.

IT IS SO ORDERED.

So Ordered this _____ day of _____, 2026.

_____
Andrew H. Dowling, Judge