IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY, PENNSYLVANIA

LEO WOYTACH, JAMES DAVIS, SHAWN TOOLAN, SCOTT STOLARIK, CHAD MARTIN, HELENA JOHNSTON, JOE CLEMENTE, and HILARY BURNS, individually and on behalf of all others similarly situated, Plaintiffs, v. DRUG AND ALCOHOL TREATMENT SERVICES, INC., Defendant.	Case No.: 2025-CV-03681

LAUREN M. MAILER
LACKAWANNA COUNTY
2026 NOV 12 A 11: 32
CLERK OF JUDICIAL RECORDS CIVIL DIVISION

DECLARATION OF ERIKA L. BRITTON REGARDING SETTLEMENT ADMINISTRATION

1. My name is Erika L. Britton, and I am over the age of 18 years. I make this declaration under the penalty of perjury, freely 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 consistent with the matters stated herein.

INTRODUCTION

2. I am a 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 in

[1] All capitalized terms herein have the same meaning as the terms defined in the Class Action Settlement Agreement and Release ("Settlement Agreement").

the development and administration of the notice plan, as set 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 Defendant'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) create, administer and oversee the Settlement Fund, b) prepare and send the Notice via mail to Settlement Class Members; c) establish and maintain the Settlement Website; d) establish and maintain a toll-free telephone line for Settlement Class Members; e) prepare weekly activity reports; f) handle inquiries from Settlement Class Members; g) re-mail Notices; h) skip-trace undeliverable addresses; i) receive and process Claim Forms; j) receive and track opt-out requests and objections; k) review supporting documentation; l) calculate and issue settlement benefits to Settlement Class Members with Valid Claims; and m) conduct such other tasks as the Parties mutually agree or the Court orders RG/2 Claims to perform.

NOTICE DISSEMINATION

6. On or about May 14, 2026, RG/2 Claims received from Defendant's Counsel an

electronic file containing the names and known mailing addresses, for the 20,377 individuals identified as Settlement Class Members. RG/2 Claims reviewed the electronic file and determined there were 20,351 unique Settlement Class Members. In order to provide the best notice practicable and locate the most recent addresses for Settlement Class Members, RG/2 Claims processed the list of 20,351 Settlement Class Member's names and addresses through the United States Postal Service's ("USPS") National Change of Address database ("NCOA") and updated the data with corrected information.

7. On June 26, 2026, RG/2 Claims caused to be served by First Class U.S. Mail the Notice to the 20,351 individuals identified as Settlement Class Members with a known mailing address in the Class List. A true and correct copy of the Notice is attached hereto as "**Exhibit A.**"

8. As of November 4, 2026, the USPS returned 7,428 Notices as undeliverable. Of the 7,428 Notices returned, 35 included a forwarding address provided by the USPS, and RG/2 Claims promptly mailed a new Notice to those Settlement Class Members. With approval from Class Counsel, RG/2 Claims performed extensive skip-trace procedures for the 7,084 undeliverable Notices received prior to the Claim Form Deadline. RG/2 Claims was able to locate updated addresses for 4,163 Settlement Class Members and issued a remailing for those addresses. A total of 3,230 Notices remain undeliverable.

SETTLEMENT WEBSITE

9. On or about June 25, 2026, RG/2 Claims made available the Settlement Website at www.DATSDataBreachSettlement.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 B.**"

b. The "Court Documents" page contains pdf copies of the Order Granting Preliminary Approval of Class Action Settlement, and the Class Action Settlement Agreement and Release.

c. A pdf copy of the Final Approval Motion will also be placed on the Settlement Website.

d. 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 Unique ID and Pin Code to submit the claim electronically.

e. 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 Code to submit the claim electronically.

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

g. As of November 4, 2026, the Settlement Website was viewed 14,994 times by 13,048 active users.

TOLL-FREE NUMBER

10. RG/2 Claims made available and hosted a toll-free number, 1-866-742-4955, to allow Settlement Class Members to learn more 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, Notice, and on the Settlement Website.

SETTLEMENT P.O. BOX

11. RG/2 Claims made available and monitored a settlement mailbox, Post Office Box 59479 in Philadelphia, PA 19102-9479 where Settlement Class Members could submit hard copy Claim Forms, requests for Claim Forms, opt-out requests, objections, and other case correspondence.

SETTLEMENT EMAIL INBOX

12. RG/2 Claims established and monitored a settlement inbox, DATSDataBreachSettlement@rg2claims.com, where Settlement Class Members could 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.

OPT-OUTS & OBJECTIONS

13. The Opt-Out Deadline for this Settlement was August 25, 2026. To date, RG/2 Claims has not received or been advised of any valid opt-out requests to the Settlement.

14. The Objection Deadline for this Settlement was August 25, 2026. To date, RG/2 Claims has not received or been advised of any objections to the Settlement.

CLAIMS PROCESSING

15. As of November 4, 2026, RG/2 Claims has received and processed 2,738 Claim Forms resulting in a 13.45% claims rate. Of the 2,738 total Claim Forms submitted, 24 Claim Forms were submitted for Cash Payment A – Documented Losses, 2,661 Claim Forms were submitted for Cash Payment B – Alternate Cash Payment, and 53 Claim Forms did not select Cash Payment A or Cash Payment B. 1,465 Claim Forms selected Medical Monitoring. Pursuant to paragraph 3.3 of the Settlement Agreement, RG/2 Claims will send a deficiency notice to any Settlement Class Member who failed to select either Cash Payment A or Cash Payment B. If the

Settlement Class Member fails to timely cure the deficiency, or fails to elect a Cash Payment option, the Claim will be treated as a claim for Cash Payment B – Alternate Cash Payment.

SETTLEMENT ADMINISTRATION

16. RG/2 Claims has incurred fees and costs associated with the Settlement Administration thus far and will incur additional costs for Claim Form review, issuing/resolving any deficiencies, calculating payments, distribution, and responding to Settlement Class Member inquires. To date RG/2 Claims has issued an invoice to Defendant for payment totaling $57,162.

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.

Executed on November 9, 2026, at Philadelphia, PA.

Erika Britton
Erika L. Britton, Declarant

Exhibit A

Court Approved Legal Notice

Leo Woytach, et al. v. Drug and Alcohol Treatment Services, Inc.
Case No. 2025-CV-03681

A Court has authorized this Notice.

This is not a solicitation from a lawyer.

www.DATSDataBreachSettlement.com
1-866-742-4955

More Information: Complete information about your rights and options, as well as the Claim Form, the Long Form Notice, and Settlement Agreement are available at **www.DATSDataBreachSettlement.com** or by calling toll free 1-866-742-4955

DATS 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

NUMERIC EQUIVALENT

Postal Service: Please do not mark barcode

Class Member ID: «Class Member ID»
Pin Code: «Pin Code»

«FirstName»«LastName»
«Address1»
«Address2»
«City», «State» «Zip»
«Country»

BLIND PERF DOES NOT PRINT

DATS SETTLEMENT CLAIM FORM

«FirstName»«LastName»
«Address1»
«Address2»
«City», «State» «Zip»
«Country»

NUMERIC EQUIVALENT

Class Member ID: «Class Member ID»
Pin Code: «Pin Code»

1. Out-of-Pocket Expense Reimbursement (Cash Payment A)
If you wish to receive Out-of-Pocket Expense reimbursement from the Settlement Fund, up to a total of $5,000.00 per Settlement Class Member, you must visit the Settlement Website, **www.DATSDataBreachSettlement.com**, to submit a Claim Form and supporting documentation for out-of-pocket expenses incurred as a result of the Data Breach.

2. Alternate Cash Payment (Cash Payment B)
☐ Check this box if you wish to receive a *pro rata* cash payment in lieu of the Out-of-Pocket Expense reimbursement. Settlement Class Members may make a claim for an Alternate Cash Payment without the need to document losses incurred as a result of the Data Breach. The amount will increase or decrease *pro rata* depending on the aggregate dollar amount of Valid Claims submitted.

3. Medical Monitoring (In addition to Cash Payment A or Cash Payment B)
☐ Check this box if you wish to receive free Medical Monitoring for one year.

4. Select one of the following payment methods:
☐ PayPal ☐ Venmo ☐ Check
Please provide the email address or phone number associated with your PayPal or Venmo account:

_____

(If you selected PayPal or Venmo and did not provide a valid email address or phone number, your payment will be mailed via check to the address above.)

5. Certification: 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 is true and correct. I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signature:_____ **Printed Name:**_____ **Date:** _____

A proposed $549,000 Settlement arising out of a Data Breach has been reached with Drug and Alcohol Treatment Services, Inc ("Defendant"). Between October 5, 2024 and October 6, 2024, an unauthorized third party potentially gained access to Defendant's computer systems where Settlement Class Members' Protected Health Information was maintained (the "Data Breach").

Who is Included? Settlement Class Members include all individuals residing in the United States whose Protected Health Information was potentially compromised in the Data Breach between October 5, 2024 and October 6, 2024, including all persons who were sent notice of the Data Breach.

What does the Settlement Provide? The Settlement establishes a $549,000 Settlement Fund to be used to pay (i) all costs of Settlement Administration including Taxes and Tax-Related Expenses; (ii) approved Out-of-Pocket Expense Claims; (iii) approved Alternate Cash Payments; (iv) approved claims for Medical Monitoring Services; (v) Service Awards; and (vi) Attorneys' Fee Award and Costs. Claimants may select **either** the Out-Of-Pocket Expense reimbursement or the Alternate Cash Payment; **AND** Medical Monitoring:

- **Out-of-Pocket Expense Reimbursement** – reimbursement for certain documented losses, i.e., money spent or fees incurred that are more likely than not related to the DATS Data Breach (up to $5,000.00);
- **Alternate Cash Payment** – a *pro rata* cash payment, in an amount to be determined consistent with the Settlement. The *Pro Rata* Cash Payment may be increased or reduced depending on the number of Settlement Class Members that participate in the Settlement.
- **Medical Monitoring** – 1 year of medical monitoring that will include medical identity theft protection through CyEx Medical Shield.

How To Get Benefits: You must complete and file a Claim Form online or by mail postmarked by **September 24, 2026,** including required Reasonable Documentation if you choose a Documented Loss Payment. You can file your claim online at **www.DATSDataBreachSettlement.com** using the Class Member ID and Pin Code on this postcard. You may also get a paper Claim Form on the Settlement Website, by calling the toll-free number 1-866-742-4955, or by contacting DATSDataBreachSettlement@rg2claims.com. If you wish to elect an Alternate Cash Payment and/or Medical Monitoring, you may check the appropriate box(es) on the attached Claim Form and return by mail.

Your Other Options: If you do not want to be legally bound by the Settlement, you must exclude yourself by **August 25, 2026.** If you do not exclude yourself, you will release any claims you may have against the Defendant or the Released Parties related to the DATS Data Breach, as more fully described in the Settlement Agreement, available on the Settlement Website. If you do not exclude yourself, you may object to the Settlement by **August 25, 2026.**

The Final Approval Hearing: The Court will hold a Final Approval Hearing on **November 24, 2026, at 10:30 AM in Courtroom #1, Lackawanna County Courthouse** before The Honorable Terrence R. Nealon to consider: whether to approve the Settlement, Service Awards, Fee Award 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.

BLIND PERF DOES NOT PRINT

Postage Required
Post Office will not deliver without proper postage.

DATS SETTLEMENT
C/O RG/2 CLAIMS ADMINISTRATION LLC
PO BOX 59479
PHILADELPHIA PA 19102-9479

Exhibit B

LEO WOYTACH, ET AL V. DRUG AND ALCOHOL TREATMENT SERVICES, INC

Case No. 2025-CV-03681

If Drug and Alcohol Treatment Services, Inc ("Defendant" or "DATS") Notified You of a Data Breach Incident,
You May be Eligible For Benefits From a Class Action Settlement

WHAT IS THIS CASE ABOUT?

A proposed Settlement has been reached in a class action lawsuit known as *Leo Woytach, et al v. Drug and Alcohol Treatment Services, Inc.*, Case No. 2025-CV-03681 ("Lawsuit"), filed in the Court of Common Pleas of Lackawanna County, Pennsylvania. This Lawsuit arises out of unauthorized access to Defendant's systems where certain files resided containing sensitive and/or Protected Health Information including, but not limited to, patient names, addresses, dates of birth, social security numbers, health insurance information, patient account numbers, medication information, diagnosis and treatment information, doctors' names, and medical claims and billing information (collectively Protected Health Information "PHI") between October 5, 2024 and October 6, 2024 (the "Data Breach"). Defendant disagrees with Plaintiff's claims and denies any wrongdoing.

WHO'S INCLUDED?

You are included in this Settlement as a Settlement Class Member if you were mailed written notification that indicated your Protected Health Information was potentially compromised as a result of the Data Breach between October 5,

2024 and October 6, 2024.

WHAT DOES THE SETTLEMENT PROVIDE?

All Settlement Class Members can receive the following benefits from the Settlement: (1) up to $5,000.00 for documented out-of-pocket expenses **OR** (2) an alternate flat cash payment that will increase or decrease *pro rata* depending on the aggregate dollar amount of Valid Claims submitted. Additionally, all Settlement Class Members may elect to receive (1) one year of medical identity theft monitoring through CyEx.

HOW TO GET BENEFITS?

All claims will be reviewed by the Settlement Administrator. You must file a Claim Form to get any money from the proposed Settlement. Claim Forms must be submitted online by September 24, 2026 or postmarked no later than September 24, 2026.

IF YOU ARE A SETTLEMENT CLASS MEMBER, YOU HAVE THE FOLLOWING OPTIONS:

YOUR LEGAL RIGHTS & OPTIONS IN THIS SETTLEMENT	
Submit a Claim	**You must submit a Valid Claim to get money from this Settlement.** Claim Forms must be submitted online by September 24, 2026, if mailed, postmarked no later than September 24, 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 about the claims in this lawsuit. You will not get any money from the Settlement. Your request to exclude yourself must be postmarked no later than August 25, 2026.

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 August 25, 2026.
Go to a Hearing	You can ask to speak in Court about the fairness of the Settlement, at your own expense. *See* Question 18 of the **Long Form Notice** (pdf/Long_Form_Notice.pdf) for more details. The Final Approval Hearing is scheduled for November 24, 2026.

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

The Court will hold the Final Approval Hearing on November 24, 2026 at 10:30 a.m. in Courtroom #1, Lackawanna County Courthouse. The hearing may be moved to a different date, time, or location without additional notice, so it is recommended that you periodically check this 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 award of Attorneys' Fees, Costs, and Expenses to Class Counsel and the request for a service award to the Class Representative.

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