

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

BARB LHOTA, JORGE P. NEWBERRY,  
MONDUOUKPE SEYIVE BANI A MEDEGAN  
FAGLA, CHRISTINA HEER, MORGAN  
STRUNSKY, QIXIN CHEN, BEICHEN SHI, and  
RICHARD DELANO CORNELL, individually and  
On behalf of all others similarly situated,

Plaintiffs,

v.

MICHIGAN AVENUE IMMEDIATE  
CARE, S.C.

Defendant.

Case No. 2022-CH-06616

Judge: Hon. Pamela McLean Meyerson

**DECLARATION OF TINA CHIANGO REGARDING  
DISSEMINATION OF NOTICE TO THE CLASS AND IN SUPPORT OF  
PLAINTIFFS MOTION FOR FINAL APPROVAL**

I, Tina Chiango, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Director of Claims Administration, Securities, and Antitrust for RG/2 Claims Administration LLC ("RG/2"), the Settlement Administrator retained in this matter, located at 30 S. 17<sup>th</sup> Street, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. RG/2 is a full-service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2's experience includes the provision of notice and administration services for settlements

arising from antitrust, consumer fraud, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 has administered and distributed in excess of \$1.8 billion in class action settlements.

3. RG/2 was retained by the parties and approved by the Court to serve as Settlement Administrator, which includes amongst other tasks, disseminating postcard notices to the class via first class mail; creating a case website and claims filing portal; setting up an IVR phone system for Class Members to get information regarding the Settlement; receiving and tracking requests for exclusion and objections; responding to Class Member inquiries; processing claim claims received; calculating and issuing a distribution to Class Members; and any additional tasks as the parties mutually agree upon or the Court orders RG/2 to perform.

4. On April 11, 2023, RG/2 received an excel file from Defendant's Counsel which contained 133,994 names and addresses of individuals identified as Settlement Class Members in this settlement. RG/2 reviewed the files, removed 25 duplicate records and compiled a mailing database.

5. On May 5, 2023, RG/2 arranged for the mailing of the Postcard Notice to be mailed to the 133,969 Settlement Class Members, which included a personalized Claim ID and Confirmation Code to be used when filing a Claim through the claims filing portal. A non-personalized copy of the Postcard Notice is attached hereto as **Exhibit A**.

6. Of the 133,969 Postcard Notices mailed, a total of 37,820 were returned by the USPS as undeliverable. Of those returned, 1,970 contained a forwarding address, which RG/2 used to immediately re-mail those Postcard Notices. RG/2 performed address verification searches (also referred to as "skip tracing") for those returned as undeliverable without a forwarding address. Re-mails were promptly sent to 26,276 Settlement Class Members via U.S. First Class mail at the updated addresses located via skip tracing. After these efforts, 9,574 remained

undeliverable. Based on this information, the Postcard Notice has reached 92.8% of the Class Members.

7. RG/2 created a settlement website, which went live on May 2, 2023, [www.MAICincident.com](http://www.MAICincident.com). The website's homepage includes a summary of the Settlement as well as Settlement Class Member's legal rights and options. The website also included: a "Contact Us" page; a "Court Documents" page, which includes the Settlement Agreement, Motion for Preliminary Approval and Preliminary Approval; and a "Notice and Claim" page, which contained a pdf of the Long Form Notice and Claim Form, as well as a link to the claims filing portal.

8. RG/2 also had an IVR (interactive voice response) system set up using the toll free number of 800-266-1652. The IVR included various questions and answers relating to the Settlement that gave callers the ability to listen to the answers to certain questions. Callers also had an option to leave their name and phone number if they wanted to a call back. To date, a total of 100 calls have been made to the IVR.

9. As referenced in the Postcard Notice and Long Form Notice, the deadline to submit a request for Exclusion from the Settlement was June 19, 2023. To date, RG/2 has received 10 Requests for Exclusion from Class Members postmarked on or before the June 19, 2023 deadline. RG/2 also received three (3) Request for Exclusion that were postmarked after the June 19, 2023 deadline. A listing of the Class Members who Requested Exclusion as well as copies of these requests are attached hereto as **Exhibit B**.

10. Also referenced in the Class Notice, the deadline to object to the Settlement was June 19, 2023. To date, RG/2 has not received or been made aware of any Objections to the Settlement.

11. To date, RG/2 has received a total of 6,347 Claim Forms, which represents a response rate of approximately 5% of the total Class Membership list.

12. Of the 6,347 Claim Forms received, RG/2 has reviewed and made a determination to allow \$329,109.08 to date. This amount is based on: 6,159 Class Members electing for the \$50 Alternative Cash Payment; 522 allowed hours and \$8,109.08 in claimed out of pocket expense. To date, the pro rata amount that each Class Member will received is approximately 109% of their allowed claim amount. As the claims deadline has not passed yet and all deficiencies for documentation have not been resolved, RG/2 is expecting that the pro rata share amount will decrease slightly prior to making the distribution to Class Members.

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 July 31, 2023 at Philadelphia, Pennsylvania.



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Tina Chiango

— **EXHIBIT A** —



**Why am I receiving this notice?** You are receiving this notice because the records of Michigan Avenue Immediate Care, S.C. (“MAIC”) show that your Personally Identifiable Information (“PII”), Personal Health Information (“PHI”) and/or Protected Biometric Information (“PBI”) may have been compromised as a result of a cybersecurity incident in May 2022. You are therefore likely a Settlement Class Member eligible to receive relief under a class action settlement.

**Who’s Included in the Settlement Class?** The Settlement Class is all 144,104 persons whose PII, PHI, and/or PBI was potentially compromised in the cybersecurity incident involving MAIC’s computer network around May 2022 (“the Data Incident”), and who were the subject of the Notice of Data Breach that MAIC published on June 30, 2022 (“Notice of Data Breach”).

**What are the Settlement Benefits?** Settlement Class Members may file claims for (a) Alternative Cash Payments, or (b) any combination of Documented Ordinary Losses, Documented Extraordinary Losses, and Credit Monitoring Services:

- Alternative Cash Payment of \$50 for Settlement Class Members; or
- Out-of-Pocket Losses: Up to \$2,500 for unreimbursed losses, including Out-of-Pocket Expenses, including the purchase of credit monitoring;
  - o as well as time lost addressing the Data Incident at \$25.00 per hour up to four (4) hours

These amounts are subject to the actual claims rate and will be adjusted up or down on a *pro rata* basis depending on the number of claims. The actual Alternative Cash Payment or claim for Out-of-Pocket Losses may be less than the benefits stated above.

**YOUR CLAIM MUST BE SUBMITTED BY AUGUST 3, 2023 TO BE VALID.**

**What are my other options?** If you **Do Nothing**, you will be legally bound by the Settlement’s terms, and you will release your claims against the Released Entities, including MAIC. You may **Opt-Out** of or **Object** to the Settlement by June 19, 2023. The Long Notice available on the Settlement Website explains how to Opt-Out of or Object to the Settlement. The Court will hold a Final Approval Hearing on August 15, 2023 to consider whether to approve the Settlement and a request for attorneys’ fees and expenses for Plaintiffs’ counsel. You may appear at the hearing, either yourself or through an attorney hired by you, but you don’t have to. For more information and to obtain a claim form, visit [www.MAICincident.com](http://www.MAICincident.com). Any individual wishing to attend the final approval hearing may do so via Zoom (Meeting ID 928 9663 2736; Password 813107). Participants may also call in to the final approval hearing using the same Meeting ID and password at (312) 626-6799.

BLIND PERF DOES NOT PRINT



Postage  
Required  
Post Office will  
not deliver  
without proper  
postage.

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



**— EXHIBIT B —**



**Lhota v MAIC  
Exclusion Filed**

<b>Exclusion</b>	<b>Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	<b>Phone</b>	<b>Postmarked</b>
1	Karen Cuthbertson	1284 Pebble Pointe DR	Rochester	MI	48307	248-840-6850	5/17/2023
2	Corey Hammond	400 N Lasalle Dr- Apt 4312	Chicago	IL	60654	312-203-9707	5/16/2023
3	Renata Polak	5415 N Sheridan Rd - Apt 3214	Chicago	IL	60640	773-504-6446	6/3/2023
4	Deborah McLeod	5411 Tannehill Dr #1086	Houston	TX	77008	713-516-4915	6/14/2023
5	Yung-Hsu Chang	21852 Canadensis Circle	Boca Raton	FL	33428	734-239-4829	6/7/2023
6	James Wangelin	638 S Lincoln St	Hinsdale	IL	60521		6/14/2023
7	Tiffany Meier	1560 North Sandburg Terr#3209	Chicago	IL	60610	708-280-7657	6/14/2023
8	Matthew Glassanos	4186 Remillard Ct	Pleasanton	CA	94566	925-577-1893	6/16/2023
9	Xinling Chen	644 W 40th St	Chicago	IL	60632	312-863-1020	6/16/2023
10	Luis Norman	112 Arguello Blvvd - Apt 1	San Francisco	CA	94118	708-979-3433	6/17/2023
11	Brienna Krueger	35497 Lambe Ln	Warrenville	IL	60563	630-327-6849	6/20/2023
12	Matthew Erickson	35497 Lambe Ln	Warrenville	IL	60563	630-300-8829	6/20/2023
13	Amanda Moncada-Perkins	856 Plainfield Naperville Rd	Naperville	IL	60540	708-595-0474	6/21/2023



MAY 23 2023

May 15, 2023

Via U.S. Mail to:

JEFFREY T. CUTHBERTSON  
Office: 248-651-9300  
Fax: 248-266-2093  
Mobile: 248-840-6840  
345 Diversion Street, Suite 410  
Rochester, MI 48307  
jeff@clawplc.com

MAIC Settlement Administrator  
Attn: Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

Re: Settlement Class Member's Opt-Out Request – Karen Cuthbertson

*Admitted in:*  
Michigan  
U.S. District Court - E.D. of MI.  
The United States Supreme Court

Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.)  
Your Notice Claim ID: YCH-H8Q-MJYZ

To Whom it May Concern:

We represent Karen Cuthbertson and are in receipt of the Settlement Administrator's Notice. Please accept this letter of my client's intent to be excluded from the proposed Settlement.

My client reserves all of her rights, remedies, or defenses in this Request and otherwise.

Very truly yours,

CUTHBERTSON LAW, PLC

JEFFREY T. CUTHBERTSON  
For the Firm

Verified:

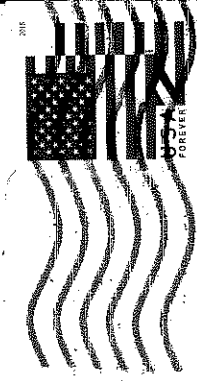
Karen Cuthbertson  
1284 Pebble Pointe Drive  
Rochester, MI 48307  
248-840-6850

JTC/kcd  
C: Client

FILED DATE: 8/1/2023 2:49 PM 2022CH06616

METROPLEX MI 480

17 MAY 2023 PM 1 L



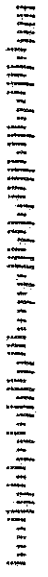
CUTHBERTSON LAW, PLC  
345 DIVERSION STREET  
SUITE 410  
ROCHESTER, MI 48307

CUTHBERTSON LAW, PLC

MAIC SETTLEMENT ADMINISTRATOR  
ATTN: EXCLUSIONS  
P.O. BOX 59479  
PHILADELPHIA, PA 19102-9479

TO:

19102-947979



MAIC SETTLEMENT ADMINISTRATOR

Attn: ~~MAIC~~ EXCLUSIONS

PO Box 59479

Philadelphia, PA 19102-9479

a) CASE NAME:

Lhota v Michigan Avenue Immediate  
Care, S.G., Case No. 2022-CH-06616  
(Ill. Cir. Ct. Cook Cnty)

b) COREY HAMMOND

400 N LASALLE DR APT 4312

CHICAGO IL 60654 USA

1-312-203-9707

c)

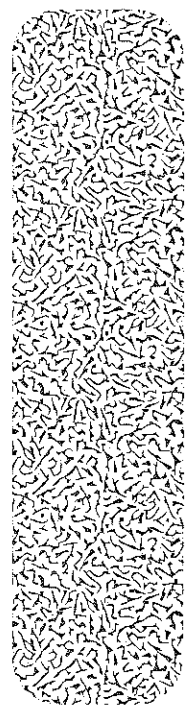
~~Corey~~

d) I request to be excluded from the settlement.



ADMINISTRATOR  
MAY 2023 PMG L

ATTN: EXCURSIONS  
NAME MIAIC SETTLEMENT ADMINISTRATOR  
ADDRESS PO BOX 59479  
CITY PHILADELPHIA  
STATE PA ZIP 19102-9479



JUN 08 2023

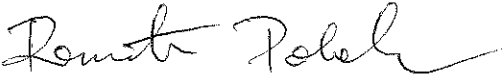
Lhota v. Michigan Avenue  
Immediate Care, S.C.

Date 6/02/2023

Case No. 2022-CH-06616 (111. Cir. Ct. Cook Cnty.)

Renata Polak  
5415 N. Sheridan Rd. Apt. 3214  
Chicago 60640, IL.  
773-504-6446

I intend to be excluded from the MAIC  
Settlement.

Renata Polak  


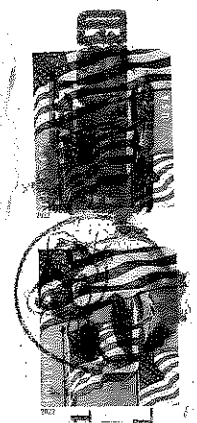
June 2nd, 2023

FILED DATE: 8/1/2023 2:49 PM 2022CH06616

P  
Ms. Renata Polak  
5415 N. Sheridan Rd.  
Apt. 3214  
Chicago, IL 60640

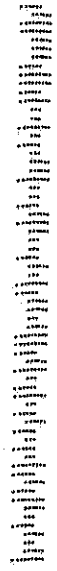
CAROL STREAM IL 601

3 JUN 2023 PM 3 L



MAIC Settlement Administrator  
Attn. Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

19102-947979



**Chiango, Tina M.**

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**From:** Deborah McLeod <deborah2436@gmail.com>  
**Sent:** Wednesday, June 14, 2023 12:06 PM  
**To:** RG2/Claims  
**Subject:** Declaring my Option Choice to MAIC Settlement

**June 14, 2023**

**TO:**

**Settlement Administrator**

MAIC Settlement Administrator  
c/o RG/2 Claims Administration LLC  
P.O. Box 59479  
Philadelphia, PA 19102-9479  
Toll Free Phone Number: 1-(800)-266-1652  
Email: [info@rg2claims.com](mailto:info@rg2claims.com)  
Fax: (215) 827-5551

**RE: Claim ID BJB-3HB-243M**

Confirmation Code 7366

This is to inform you that I hereby elect to exclude myself from the MAIC settlement; I understand that I will receive no benefits, but will retain my legal claims against MAIC.

Sincerely,

Deborah McLeod

2100 Tannehill Dr. #1086

Houston TX 77008

713-516-4915

[Deborah2436@gmail.com](mailto:Deborah2436@gmail.com)



## Settlement Class Member's Opt-Out Request

- a) Case name: *Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.)*
- b) Member information:
- a. Full name: Yung-Hsu Chang
  - b. Address: 21852 Canadensis Cir, Boca Raton, FL 33428-3907
  - c. Phone number: +1-734-239-4829
- c) Personal and original signature:



6/7/2023

- d) I, Yung-Hsu Chang, send this opt-out request to be excluded from the Settlement with case name of *Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.)*.

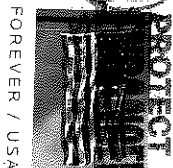
Yanyan Chang

21852 Camdensis Cir

Boca Raton, FL 33428-3907

MIAMI FL 330

7 JUN 2023 PM 5 L



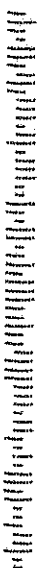
Attn: Exclusions

MAIC Settlement Administrator

P.O. Box 59479

Philadelphia, PA 19102

15102-547979



JUN 26 2023

MAIC Settlement  
Settlement Administrator  
P.O. Box 59479  
Philadelphia, PA 19102-9479

## Request for Exclusion

**Proceeding:**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

BARB LHOTA, JORGE P. NEWBERY, MONDUOUKPE SEYIVE BANI A MEDEGAN FAGLA, CRISTINA HEER, MORGAN STRUNSKY, QIXIN CHEN, BEICHEN SHI, and RICHARD DELANO CORNELL, individually and on behalf of all others similarly situated, Plaintiffs, v. MICHIGAN AVENUE IMMEDIATE CARE, S.C. Defendant.

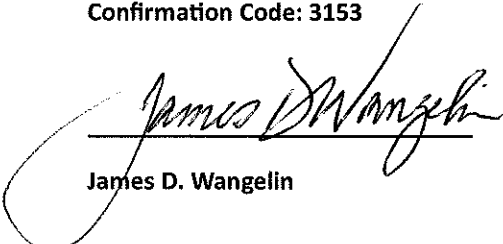
Case No. 2022-CH-06616 Judge: Hon. Pamela McLean Meyerson

**Individual opting out:**

James D. Wangelin  
638 S. Lincoln St.  
Hinsdale, IL 60521

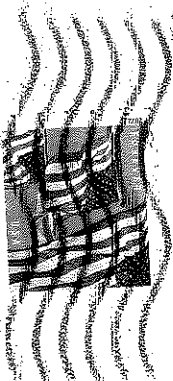
**Claim ID: 5A7-N7V-WJ9D**

**Confirmation Code: 3153**

  
James D. Wangelin

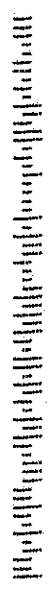
JD Wangelin  
638 S. Lincoln St.  
Hinsdale, IL 60521

SUBURBAN IL 604  
MAY 2023 745-1



MAIC Settlement  
Settlement Administrator  
P.O. Box 59479  
Philadelphia, PA 19102-9479

19102-9479




JUN 26 2023

**Opt-Out Request**

Case name: *Lhota v. Michigan Avenue Immediate Care, S.C.*, Case No. 2022-CH-06616 (III. Cir. Ct. Cook Cnty.)

Full name, address, and telephone number: Tiffany Meier, 1560 North Sandburg Terrace, #3209, Chicago, IL 60610, 708-280-7657

Please accept this request as my intent to be excluded from the Settlement in the above-referenced matter.



\_\_\_\_\_  
Signature

FILED DATE: 8/1/2023 2:49 PM 2022CH06616

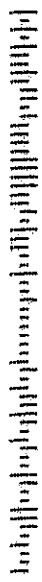
Meier  
1560 N. Sandburg Terr, #3209  
Chicago, IL 60676 SUBURBAN IL 604

14 JUN 2023 PM 5 41



MAIC Settlement Administrator  
Attn: Exclusions  
PO Box 59479  
Philadelphia, PA 19102-9979

102-947979



JUN 26 2023

Matthew Glassanos  
4186 Remillard Court  
Pleasanton, CA 94566  
925-577-1893  
6/15/2023

MAIC Settlement Administrator  
Attn: Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

To the MAIC Settlement Administrator:

It is my intent to be **EXCLUDED** from the Settlement in the matter of the case *Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.)*.

I elect to retain my right to initiate a lawsuit against the Released Persons, including MAIC related to the claims released by the Settlement.

Sincerely,

 6/15/2023

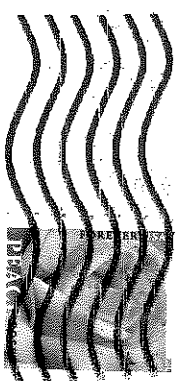
Matthew Glassanos

FILED DATE: 8/1/2023 2:49 PM 2022CH06616

Matthew Glassman  
4186 Remillard Ct.  
Pleasanton, CA 94566

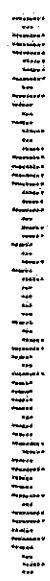
OAKLAND CA 945

16 JUN 2023 PM 3 L



MATC Settlement Administrator, ATTN: Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

95102-947979





JUN 26 2023

06/15/2023

5:24 P.M.

Lhota v. Michigan Avenue Immediate Care, S.C.,  
Case No. 2022-CH-06616 (III. Cir. Ct. Cook Cnty.)

Xinling Chen

3118 W. 40th Street

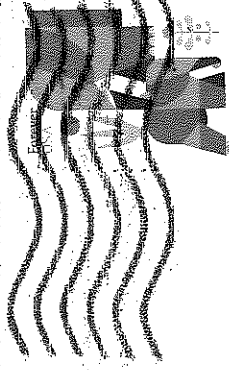
(1)-(312)-863-1020

Hello,

As a Settlement Class Member, I want to make a request to exclude myself from this case.

- Xinling chen
- ~~Xinling~~ chen

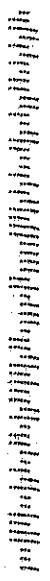
Xinling Chen  
3118 W. 40th Street  
Chicago, IL 60632



S SUBURBAN IL 604  
16 JUN 2023 PM 2 L

To: MAIC Settlement Administrator  
Attn: Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

19102-947979



JUN 27 2023

06/16/2023

I want to be excluded from the settlement.

**Case name:** Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.)

**Full name:** Luis Norman

**Address:** 112 Arguello Blvd, Apt 1, San Francisco, CA 94118

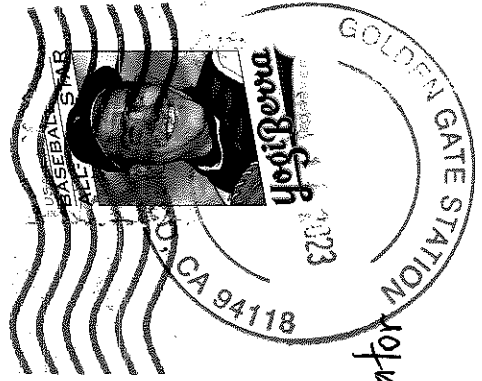
**Phone number:** 708-979-3433

**Signature:**

A handwritten signature in black ink, appearing to read "L Norman", written over the printed word "Signature:".

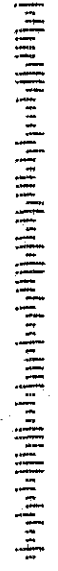
Luis Norman  
112 Arguello Blvd, Apt 1  
San Francisco, CA 94118

SAN FRANCISCO CA 940  
17 JUN 2023 PM 5 L



MAICS Settlement Administrator  
Attn: Exclusions  
P.O. Box 594779  
Philadelphia, PA 19102-9479

19102-947979



JUN 27 2023

MAIC Settlement Administrator  
Attn: Exclusions  
PO Box 59479  
Philadelphia, PA 19102-9479

To MAIC Settlement Administrator,

This is my request to **opt-out of (and exclude myself from)** the following settlement case.

Case name: Lhota v. Michigan Avenue Immediate Care, S.C.

Case number: 2022-CH-06616 (Ill Cir. Ct. Cook Cnty.)

My name: BRIENNA KRUEGER

My address: 38497 LAMBE LANE  
WARRENVILLE, IL 60563-6005

My phone number: 630-327-6849

Signature: 

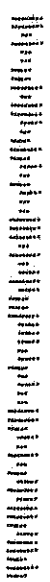
FILED DATE: 8/1/2023 2:49 PM 2022CH06616

35491 LAMBE UN  
WARRENTONCE #L 60563

CAROL STREAM IL 601  
20 JUN 2023 PM 11 L

MAIC SETTLEMENT ADMINISTRATOR  
ATTN: EXCLUSIONS  
PO BOX 59479  
Philadelphia, PA 19102-9479

19102-947979



U.S. POSTAGE  
\$0.63  
RDC 99  
60189 FCM  
Date of sale  
06/19/23  
02  
9816040987

FOLD HERE

FILED DATE: 8/1/2023 2:49 PM 2022CH06616

MAIC Settlement Administrator  
Attn: Exclusions  
PO Box 59479  
Philadelphia, PA 19102-9479

To MAIC Settlement Administrator,

This is my request to **opt-out of (and exclude myself from)** the following settlement case.

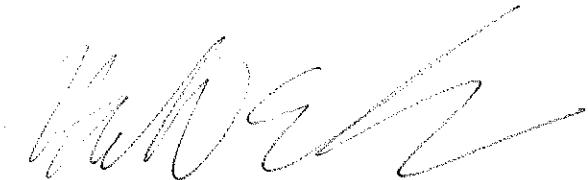
Case name: Lhota v. Michigan Avenue Immediate Care, S.C.

Case number: 2022-CH-06616 (Ill Cir. Ct. Cook Cnty.)

My name: MATTHEW ERICKSON

My address: 35497 LAMBE LANE  
WARRENVILLE, IL 60563-6005

My phone number: 630-300-8829

Signature: 

35497 LAMBE LN.  
WARRENVILLE, IL 60563

CAROL STREAM IL 601  
20 JUN 2023 PM 11 L

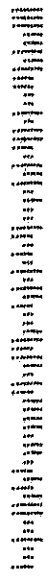
MAIL SETTLEMENT ADMINISTRATOR  
ATTN: EXCLUSIONS  
PO BOX: 59479  
PHILADELPHIA, PA 19102-9479

U.S. POSTAGE  
RDC 99  
60189 FCM  
Date of sale  
06/19/23  
02  
6WGT  
9816040987



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19102-947979





JUN 27 2023

June 19, 2023

MAIC Settlement Administrator  
Attn: Exclusions  
P.O. Box 59479  
Philadelphia, PA 19102-9479

Settlement Class Member's Opt-Out Request

- (a) This opt-out request is in reference to case Lhota v. Michigan Avenue Immediate Care, S.C., Case No. 2022-CH-06616 (Ill. Cir. Ct. Cook Cnty.).
- (b) My details are:  
Amanda Moncada-Perkins  
856 Plainfield Naperville Road  
Naperville, IL 60540  
708-595-0474
- (c) Please accept this written and signed request as my intent to be excluded from the class action settlement against Michigan Avenue Immediate Care in the case referenced above.

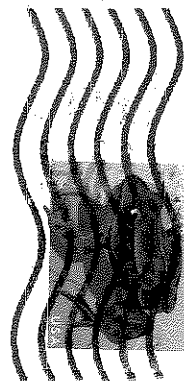
Thank you,



Amanda Moncada-Perkins

CAROL STREAM IL 601

21 JUN 2023 PM 5 L



*MALC Settlement Admin'strator*

*Attn: Exclusions*

*P.O. Box 59479*

*Philadelphia, PA 19102-9479*

19102-9479

