

Exhibit 1

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
SALINE COUNTY, ILLINOIS

PHILLIP LOWERY, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

EGYPTIAN PUBLIC AND MENTAL
HEALTH DEPARTMENT, d/b/a
EGYPTIAN HEALTH DEPARTMENT,

Defendant.

Case No. 2024LA10

CLASS ACTION

**DECLARATION OF EDWARD DATTILO
RE: NOTICE PROCEDURES**

I, Edward Dattilo, declare and state as follows:

1. I am a Senior Project Manager with Verita, located at 1 McInnis Pkwy, San Rafael, CA 94903. Pursuant to the Order Preliminarily Approving Class Action Settlement (the “Preliminary Approval Order”) dated April 21, 2025, the Court appointed Verita as the Claims Administrator in connection with the proposed Settlement of the above-captioned Action.¹ I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

CLASS LIST

2. On January 22, 2025, Verita received 11 files from Defendant containing a list of 129,493 records identified as the Class List. The Class List included names and addresses for Class Members. Verita formatted the list for mailing purposes, removed 12,840 duplicate records, and processed the names and addresses through the National Change of Address Database (“NCOA”) to update any addresses on file with the United States Postal Service (“USPS”). A total

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement, dated December 20, 2024 (the “Settlement Agreement”) and/or the Preliminary Approval Order.

of 9,703 addresses were found and updated via NCOA. Verita updated its proprietary database with the Class List.

MAILING OF THE NOTICE PACKET

3. On May 21, 2025, Verita caused the postcard notice (the “Notice”) to be printed and mailed to the 114,023 names and mailing addresses in the Class List. 2,630 Class Members had an incomplete or invalid address and were not sent the Notice. A true and correct copy of the Notice is attached hereto as Exhibit A.

4. Since mailing the Notice to the Class Members, Verita has received 35,757 Notices returned by the USPS with undeliverable addresses. Verita has received 2,717 Notices returned by the USPS with forwarding addresses. Verita immediately caused Notice Packets to be re-mailed to the forwarding addresses supplied by the USPS. Through credit bureau and/or other public source databases, Verita performed address searches for the other undeliverable Notices and was able to find updated addresses for 1,225 Class Members. Verita promptly re-mailed Notice to the found new addresses.

SETTLEMENT WEBSITE

5. On or about May 21, 2025, Verita established a website www.ehddatasettlement.com dedicated to this matter to provide information to the Class Members and to answer frequently asked questions. The website URL was set forth in the Postcard Notice, Long Form Notice, and Claim Form. Visitors of the website can download copies of the Notice, Claim Form, and other case-related documents. Visitors can also submit claims online, and, if applicable, upload supporting documentation.

TELEPHONE HOTLINE

6. Verita established and continues to maintain a toll-free telephone number 1-833-419-3894 for potential Class Members to call and obtain information about the Settlement and/or request a Notice Packet. The telephone hotline became operational on May 21, 2025, and is

accessible 24 hours a day, 7 days a week. As of August 5, 2025, Verita has received a total of 237 calls to the telephone hotline, totaling 835 minutes of use.

CLAIM FORMS

7. The postmark deadline for Class Members to file claims in this matter is August 19, 2025. To date, Verita has received 4,248 timely-filed claim forms. Verita expects additional timely-filed claim forms to arrive over the next few weeks. It is possible the total number of valid claims could change slightly depending upon the number of claims received during that timeframe.

REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE

8. The Notice informs Class Members that requests for exclusion from the Class must be postmarked no later than July 21, 2025. As of the date of this declaration, Verita has not processed any requests for exclusion.

OBJECTIONS TO THE SETTLEMENT

9. The postmark deadline for Class Members to object to the settlement was July 21, 2025. As of the date of this declaration, Verita is not aware of any objections to the settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 7, 2025 at Louisville, Kentucky.

Edward Dattilo

Edward Dattilo

EXHIBIT A

LEGAL NOTICE ONLY TO BE
OPENED BY THE INTENDED
RECIPIENT

A court has authorized this Notice.

This is not a solicitation from a
lawyer.

EHD Data Incident
Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

«3of9 Barcode»

«BARCODE»

Postal Service: Please do not mark barcode

EGLO: ClaimID: «Claim Number»

PIN: «PIN»

«FIRST1» «LAST1»

«ADDRESS LINE 2»

«ADDRESS LINE 1»

«CITY», «STATE»«PROVINCE» «POSTALCODE»

«COUNTRY»



VISIT THE
SETTLEMENT
WEBSITE BY
SCANNING
THE PROVIDED
QR CODE

EGLO

Lowery v. Egyptian Public and Mental Health Department, d/b/a Egyptian Health Department, No. 2024LA10

ClaimID: <<Claim_Number>>

THIS IS NOT A CLAIM FORM

PERSONAL INFORMATION UPDATE FORM

If you wish to notify the Settlement Administrator of any change in your contact information,
you may fill out and return this card.

First Name:	
<div></div>	
Last Name:	
<div></div>	
Primary Address:	
<div></div>	
City:	State: ZIP:
<div></div>	<div></div>

If Your Personal Information Was Potentially Exposed in a Data Incident Involving Egyptian Public and Mental Health Department, You May Be Eligible for a CASH PAYMENT or Other Benefits from a Class Action Settlement.

PLEASE VISIT WWW.EHDDATASETTLEMENT.COM FOR MORE INFORMATION.

Why am I receiving this Notice? A class action settlement in the case entitled *Lowery v. Egyptian Public and Mental Health Department, d/b/a Egyptian Health Department*, No. 2024LA10, currently pending in the Circuit Court of Saline County, Illinois, has been reached between the Plaintiffs and Defendant Egyptian Public and Mental Health Department (“EHD”). The case concerns a cyberattack on EHD which occurred on or about December 21, 2023 (the “Data Incident”). You are receiving this Notice because EHD’s records show that your personal information was potentially accessible as a result of the Data Incident. **The records show that you may be a member of the Settlement Class, defined below.**

Who’s Included in the Settlement Class? The Settlement Class includes all persons whose personally identifiable information or personal health information was potentially accessible in the Data Incident, including all persons who were sent a notice of this Data Incident, except for certain excluded persons, including, but not limited to, the judge presiding over the action, EHD’s officers and directors, and persons who opt out of the Settlement (please see the Settlement Website for further details).

What are the Settlement benefits? The Settlement provides for payments to people who submit valid claims for: (i) an Alternative Cash Payment, **OR** (ii) up to four hours of lost time for Settlement Class Members who spent at least one-half hour responding to the Data Incident, at the rate of \$25.00 per hour, (iii) up to \$300.00 for ordinary unreimbursed out-of-pocket expenses incurred as a result of the Data Incident, (iv) up to \$5,000.00 for extraordinary unreimbursed out-of-pocket expenses incurred as a result of the Data Incident, and (v) 24 months of three-bureau credit monitoring services. Please visit www.ehddatasettlement.com for a full description of Settlement benefits and more information on how to submit a Claim Form. The deadline to submit a Claim Form is **August 19, 2025**.

What are my options? To receive payment, you must submit a Claim Form by August 19, 2025. The Claim Form can be found on the website www.ehddatasettlement.com. If you do not want to be legally bound by the Settlement, you must **opt out** of the Settlement by **July 21, 2025**. If you want to **object** to the Settlement, you must file an objection by **July 21, 2025**. The Long-Form Notice available on the Settlement Website explains how to submit a Claim Form, opt out, or object.

The Court’s Final Approval Hearing. The Court will hold a Final Approval Hearing on **August 21, 2025**, to consider whether to approve the Settlement, a request for attorneys’ fees, costs, and expenses for Plaintiffs’ counsel, and Service Awards for the Class Representatives. You may appear at the hearing, either yourself or through an attorney hired by you, but it is not required. More information is available on the website.

For more information, please visit www.ehddatasettlement.com or call toll-free 1-833-419-3894



PLACE

STAMP

HERE

EGL0

EHD DATA INCIDENT
SETTLEMENT ADMINISTRATOR
PO BOX 301134
LOS ANGELES CA 90030-1134

