

If you were notified by Mile Hi Foods, Co. about a September 2024 Data Security Incident, you may be entitled to a Cash Payment.

Schoeder-Rummel v. Mile Hi Foods, Co.
District Court for Denver County, Colorado
Case No. 2024CV33968

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

- A settlement has been reached in a class action lawsuit against Mile Hi Foods, Co., (“Mile Hi” or “Defendant”). The Settlement resolves claims brought by individuals impacted by the data security incident that took place on or around September 13, 2024, that resulted in the potential access to the private information of Mile Hi’s current and former employees (the “Data Incident”). The private information of employees including names and Social Security numbers were potentially accessible in the Data Incident.
- You are a “Class Member” if your private information was accessed in the Data Incident and you received notice from Mile Hi regarding the incident.
- All Settlement Class Members are eligible to receive credit monitoring services and either (a) payment for documented losses up to \$3,000 or (b) a Cash Payment of up to \$50, subject to a pro rata adjustment based upon the total number of valid claims.

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

Your Legal Rights and Options		Deadline
DO NOTHING	You will receive no payment and will no longer be able to sue Defendant over the claims resolved in the Settlement. You will remain a member of the Settlement Class and be subject to the terms of the Settlement if approved by the Court.	No Deadline
SUBMIT A CLAIM FORM	The only way to receive a cash payment or credit monitoring services.	January 13, 2026
EXCLUDE YOURSELF	If you ask to be excluded, you will not receive a cash payment, but you may be able to file your own lawsuit against Defendant, for the same claims. This is the only option that leaves you the potential to file your own lawsuit against Defendant for the claims that are being resolved by the Settlement. To be effective, you must submit a request for exclusion by the deadline.	December 14, 2025
OBJECT	If you do not exclude yourself from the Settlement Class, you may submit an objection telling the Court why you do not like the Settlement. If your objection is overruled, you will be bound by the Settlement.	December 14, 2025

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

BASIC INFORMATION

1. Why is this Notice being provided?

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

The Honorable Andrew Patrick McCallin of the District Court for Denver County, Colorado is overseeing this class action. The case is known as *Schoeder-Rummel v. Mile Hi Foods, Co.*, Case No. 2024CV33968 (the “Lawsuit”). The people who filed this lawsuit are referred to as the “Plaintiffs” or “Class Representatives,” and the entity sued, Mile Hi Foods, Co. are referred to as “Defendant.”

2. What is this lawsuit about?

The Lawsuit arises from a data security incident. On or around September 13, 2024, Mile Hi discovered that a cybercriminal accessed information on its network. Defendant mailed notice of the Data Incident to Settlement Class Members.

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

3. Why is the lawsuit a class action?

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

4. Why is there a Settlement?

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

The Class Representative in this Lawsuit is Abigail Schoeder-Rummel.

WHO IS INCLUDED IN THE SETTLEMENT?

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

You are a Settlement Class Member if your private information was potentially involved in the Data Incident discovered in September 2024. Defendant previously mailed notice of the Data Incident to Settlement Class Members.

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

Yes. Excluded from the Settlement Class are Defendant and their governing board members, the Judge presiding over the Lawsuit and members of the Judge's immediate family, and Settlement Class Members who submit a valid Request for Exclusion.

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

If you are still not sure whether you are a Settlement Class Member, you may go to the settlement website at www.MileHiSettlement.com or call the Claims Administrator's toll-free number at 1-888-711-2036 or by emailing MileHiSettlement@cptgroup.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

Defendant has agreed to a claims made settlement with an aggregate cap of \$400,000. These funds will be used to pay all valid claims made by Settlement Class Members, notice and administration costs, service award, and attorneys' fees and costs. If the total amount of these payments exceeds \$400,000, the payments on valid claims will be reduced on a pro rata basis.

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

Credit Monitoring Services: All Settlement Class Members may enroll in two (2) years of one (1) bureau Credit Monitoring Services. Instructions for enrollment will be provided once the Settlement is approved.

Cash Payment Options: You may select either—Alternative Cash Payment or Ordinary Losses and/or Extraordinary Losses.

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

Examples of Ordinary Losses include: (i) unreimbursed losses relating to fraud or identity theft; (ii) credit monitoring costs that were incurred on or after the date of the Data Incident through the date of claim submission; and (iii) bank fees, long-distance phone charges, postage, or gasoline for local travel.

Examples of supporting documentation include: (i) credit card statements; (ii) bank statements; (iii) invoices; (iv) telephone records; and (v) receipts. "Self-prepared" documents such as handwritten receipts are, by themselves, insufficient to receive reimbursement, but can be considered to add clarity or support other submitted documentation. You will not be reimbursed for expenses if you have been reimbursed for the same expenses by another source.

- 2. Extraordinary Losses.** You may submit a timely and valid Claim Form and must provide supporting documentation for up to \$3,000 per person if all of the following are met: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Incident; (iii) the loss occurred between the date of the Data Incident and the Claims Deadline; (iv) the loss is not already covered by one or more of the other reimbursement categories; (v) the Settlement Class Member made reasonable efforts to avoid the loss or seek reimbursement for the loss, including, but not limited to, exhaustion of all available credit monitoring insurance and identity theft insurance.

Examples of Extraordinary Losses may include, without limitation, the unreimbursed costs, expenses, losses, or charges incurred as a result of identity theft or identity fraud, falsified tax returns, or other possible misuse of Private Information.

- 3. Alternative Cash Payment.** As an alternative to filing a claim for Ordinary Losses and Extraordinary Losses, you can elect to make a claim for an Alternative Cash Payment of up to \$50. To receive this benefit, Settlement Class Members must submit a Valid Claim, but no documentation is required to make a claim. The amount of the Alternative Cash Payment will be decreased on a pro rata basis, depending upon the number of valid claims filed and the amount of funds available for these payments.

HOW TO GET BENEFITS FROM THE SETTLEMENT

9. Do I need to submit a claim?

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

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

To receive a cash payment and or credit monitoring services, you must submit a valid and timely Claim Form to the Claims Administrator by **January 13, 2026**. You will need your name, address, telephone number, and email address, if applicable, and CPT ID provided in the Postcard Notice sent to you, to file a Claim Form.

Claim Forms can be submitted by mail or online at www.MileHiSettlement.com. If by mail, the Claim Form must be **postmarked** by **January 13, 2026**. You may request a Claim Form be mailed to you by calling 1-888-711-2036 or by writing to:

Schoeder-Rummel v. Mile Hi Foods, Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
MileHiSettlement@cptgroup.com

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

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

12. What are the Released Claims?

The Settlement Agreement in Section 10 describes the Release, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.MileHiSettlement.com or in the public Court records on file in this Lawsuit. You can also request a copy of the Settlement Agreement be mailed to you by calling or writing to the Claims Administrator. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

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

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

Schoeder-Rummel v. Mile Hi Foods, Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
MileHiSettlement@cptgroup.com

14. When will I receive my Settlement Benefits?

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

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

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed Cassandra Miller of Strauss Borrelli PLLC, 980 N. Michigan Avenue, Suite 1610, Chicago, IL 60611 and Sommer D. Luther of Wagstaff Law Firm, 940 Lincoln Street, Denver, CO 80203 as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in the Lawsuit.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees and costs not to exceed \$110,000. They will also ask the Court to approve service award not to exceed \$5,000.00 to the Plaintiff for her service to the Lawsuit and for their efforts in achieving the Settlement. If awarded by the Court, attorneys' fees and costs and the service award will be paid by Defendant. The Court may award less than these amounts.

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

OPTING OUT OF THE SETTLEMENT

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

17. How do I get out of the Settlement?

To opt-out of the Settlement, you must mail a written notice of intent to opt-out, also referred to as a “Request for Exclusion” in the Settlement Agreement. The written notice must be signed by you, include your name, mailing address, and clearly state that you wish to be excluded from the Settlement. You cannot exclude yourself by telephone or email.

The opt-out request must be postmarked by the United States Postal Service and sent to the Claims Administrator at the following address by December 14, 2025:

Schoeder-Rummel v. Mile Hi Foods, Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

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

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

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

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

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Settlement or requested attorneys’ fees, costs and service awards. The objection must include all the following information:

1. Your full name, current address, current telephone number, and any email address;
2. The case name and number — *Schoeder-Rummel v. Mile Hi Foods, Co.*, Case No. 2024CV33968;
3. Information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class (e.g., copy of your Postcard Notice, copy of the original notice of the Data Incident, or a statement explaining why you believe you are a Settlement Class Member);
4. A written statement of the position you wish to assert, including the legal and factual grounds for the position;
5. Copies of any other documents you wish to submit in support of your position;
6. The identity of any and all counsel representing you in connection with the objection;
7. A statement whether you or your counsel request to appear at the Final Approval Hearing; and
8. Your signature or the signature of your duly authorized attorney or any other duly authorized representative representing you in connection with the objection.

To be timely, written notice of an objection in the appropriate form must be mailed, postmarked by the United States Postal Service Claims Administrator and emailed or mailed to Class Counsel and Mile Hi’s Counsel as provided below no later than December 14, 2025.

CLASS COUNSEL	DEFENDANT'S COUNSEL	CLAIMS ADMINISTRATOR
Cassandra Miller STRAUSS BORRELLI PLLC One Magnificent Mile 980 N Michigan Avenue, Suite 1610 Chicago IL, 60611 cmiller@straussborrelli.com	James W. Davidson O'HAGAN MEYER One East Wacker Drive, Suite 3400 Chicago, IL 60601 jdavidson@ohaganmeyer.com	<i>Schoeder-Rummel v. Mile Hi Foods, Co.</i> c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 9260

Any Settlement Class Member who fails to comply with the requirements for objecting in Section 9 of the Settlement Agreement waives and forfeits any and all rights they may have to appear separately and/or to object to the Settlement Agreement and will be bound by all the terms of the Settlement Agreement and by all proceedings, orders and judgments in the Lawsuit.

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

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

THE FINAL APPROVAL HEARING

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **March 16, 2026, at 9:00 a.m.**, before Judge Andrew Patrick McCallin at the Denver District Court, 1437 Bannock Street, Denver, CO 80202.

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

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

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

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

24. May I speak at the Final Approval Hearing?

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

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

IF YOU DO NOTHING

25. What happens if I do nothing at all?

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

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.MileHiSettlement.com, by calling 1-888-711-2036 or by writing to:

Schoeder-Rummel v. Mile Hi Foods, Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
MileHiSettlement@cptgroup.com

**PLEASE DO NOT TELEPHONE THE COURT OR ITS
CLERK’S OFFICE REGARDING THIS NOTICE.**