

*Y.G.R., V.G.R., minors, by and through their parent and guardian, ANA G. ROBLES SOLIS, individually and on behalf of all others similarly situated v. Highline School District NO. 401, Case 25-2-11395-7 SEA*  
SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING

**If you reside in the United States and your Private Information was potentially impacted in the Data Security Incident experienced by Highline School District No. 401 in or around September 2024, you may be eligible for benefits from a class action settlement.**

*Para una notificación en español, visite [www.hsddataincident.com](http://www.hsddataincident.com).*

***A Washington court has determined that there is sufficient evidence to suggest that this Settlement might be fair, adequate, and reasonable and thereby ordered this notice. Any final determination as to these matters will be made at the Final Fairness Hearing.***

***This is not junk mail, an advertisement or a lawyer solicitation.***

- A settlement has been proposed in a class action lawsuit against Highline School District No. 401 (“Highline”) arising out of a data security incident that occurred on or around September 7, 2024, during which unauthorized third parties allegedly gained access to certain files containing the personal information of current and former students and employees of Highline (the “Data Security Incident”). The potentially files accessed in the Data Security Incident contained the following information, which varied by individual: names, addresses, dates of birth, Social Security numbers, driver’s license numbers, financial account information, passport numbers, employment information, digital signature, medical information, health insurance information, student identification numbers, student records, demographic information, and/or grade information (“Private Information”).
- On April 11, 2025, Plaintiffs filed a class action lawsuit on behalf of themselves and those similarly situated, asserting claims against Highline for negligence, violation of the Washington Data Breach Disclosure Law (RCW 19.255.044, *et seq.*), unjust enrichment, breach of implied contract, and invasion of privacy. Highline denies all of the claims made against it in the Lawsuit, as well as all charges of wrongdoing or liability against it.
- If you reside in the United States and you received a notice that your Private Information was potentially impacted in the Data Security Incident perpetrated against Highline on or around September 7, 2024, you may be part of the Settlement Class and may be eligible for benefits. You may have received a notice concerning the Data Security Incident from Highline or its authorized representative.
- The settlement provides up to \$5,000 in reimbursement for documented out-of-pocket losses. If, after all other payments and expenses are paid for out of the Settlement Fund, there remain any funds in the Settlement Fund, any Settlement Class Members who have submitted a claim for any of the other settlement benefits will be paid a share of the residual funds.
- Your legal rights are affected regardless of whether you do or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>SUBMIT A CLAIM FORM</b> <b>Deadline: April 20, 2026</b>	This is the only way to receive a payment.
<b>EXCLUDE YOURSELF FROM THE SETTLEMENT</b> <b>Deadline: March 20, 2026</b>	Get no benefits. This is the only option that may allow you to individually sue Highline over the claims being resolved by this settlement.
<b>OBJECT TO THE SETTLEMENT</b> <b>Deadline: March 20, 2026</b>	Write to the Court with reasons why you do not agree with the settlement.
<b>GO TO THE FINAL APPROVAL HEARING ON APRIL 24, 2024, AT 9:00 AM PT</b>	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.
<b>DO NOTHING</b>	You will not get any compensation from the settlement, and you will give up certain legal rights.

**Questions? Call 1-888-468-0613 or visit [www.hsddataincident.com](http://www.hsddataincident.com)**

- These rights and options – **and the deadlines to exercise them** – are explained in this notice. For complete details, view the Settlement Agreement at [www.hsddataincident.com](http://www.hsddataincident.com) or call 1-888-468-0613.
- The Court in charge of this case still has to decide whether to grant final approval of the settlement. Payments will be made and settlement benefits distributed only after the Court grants final approval of the settlement and after any appeals are resolved in favor of the settlement.

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## BASIC INFORMATION

### 1. Why was this Notice issued?

The Court authorized this notice because you have a right to know about the proposed settlement in this Class Action and about all of your options before the Court decides whether to give “Final Approval” to the settlement. This notice explains the legal rights and options that you may exercise before the Court decides whether to approve the settlement.

Judge Michael Scott of the Superior Court of King County, Washington, is overseeing this case. The case is known as *Y.G.R., V.G.R., minors, by and through their parent and guardian, ANA G. ROBLES SOLIS, on behalf of themselves and all others similarly situated v. Highline School District NO. 401*, Case No. 25-2-11395-7 SEA (the “Lawsuit”). The individuals who sued are called the Plaintiffs. Highline is called the Defendant.

### 2. What is this lawsuit about?

A class action is a lawsuit in which one or more plaintiffs sue on behalf of a group of people who purported to have similar claims. The Plaintiffs claim that Defendant experienced a targeted cyber-attack that allowed access to Defendant’s data, which resulted in the potential compromise of personal identifiable information.

Highline denies all of the claims made against it in the Lawsuit, as well as all charges of wrongdoing or liability against it.

### 3. What is a class action?

In a class action, one or more people called “Plaintiff(s)” or “Representative Plaintiff(s)” (in this case, Plaintiffs Y.G.R., V.G.R., minors, by and through their parent and guardian, Ana G. Robles Solis, and Aaron Jenkins) who sues on behalf of all people who have similar claims. Together, all these people are called a Class or Class Members. One Court and one judge resolve the issues for all Class members, except for those who exclude themselves from the Class Members who participate in the settlement (“Settlement Class”).

### 4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Highline. Instead, Plaintiffs and Highline negotiated a settlement that allows both Plaintiffs and Highline to avoid the risks and costs of lengthy and uncertain litigation, as well as the uncertainty of trial and appeals. It also allows Settlement Class Members to obtain benefits without further delay. The Representative Plaintiffs and their attorneys believe the settlement is best for all Settlement Class Members. The settlement does not mean that Highline did anything wrong.

## WHO IS IN THE SETTLEMENT?

### 5. How do I know if I am included in the Settlement?

You are part of this settlement as a Class Member if you are an individual residing in the United States who was notified that your Information was potentially impacted in the Data Security Incident experienced by Highline School District No. 401 in or around September 2024.

Class Members consist of approximately 94,102 individuals. Eligible Settlement Class Members will be mailed notice of their eligibility and Settlement Class membership will be verified against that mailed list. Class Members specifically exclude all persons who are directors or officers of Highline, the Judge assigned to the Action, and that Judge’s immediate family and Court staff.

### 6. What if I am not sure whether I am included in the settlement?

If you are not sure whether you are included in the settlement, or have any other questions related to the settlement, you may:

1. Call 1-888-468-0613
2. Email [hsddataincident@cptgroup.com](mailto:hsddataincident@cptgroup.com)
3. Write to:  
Solis v Highline School District No. 401  
c/o CPT Group, Inc.  
PO Box 19504  
Irvine, CA 92623

**Questions? Call 1-888-468-0613 or visit [www.hsddataincident.com](http://www.hsddataincident.com)**

Please do not contact the Court with questions.

## THE SETTLEMENT BENEFITS

### 7. What does the settlement provide?

The settlement provides for a cash payment of up to \$5,000 for documented out-of-pocket losses. To submit a claim for out-of-pocket losses you must provide information and/or documentation with the Claim Form. If, after all other payments and expenses are paid for out of the Settlement Fund, there remain any funds in the Settlement Fund, any Settlement Class Members who have submitted a claim for any of the other settlement benefits will be paid a *pro rata* share of the residual funds. If the total approved claims for these benefits exceed \$650,000, said benefits will be reduced, *pro rata*, such that the aggregate value of all payments does not exceed \$650,000.

### 8. What payments are available?

Out-of-Pocket Loss Payment: Class Members are eligible to submit a claim for documented out-of-pocket losses, up to \$5,000, including, for example, unreimbursed losses relating to fraud or identity theft, unreimbursed costs of credit monitoring incurred between the time of the Data Incident and the time the claim is submitted, and unreimbursed bank fees, postage, or gasoline for travel. Specifically, Class Members may claim reimbursement for the following:

- postage, copying, scanning, faxing, mileage and other travel-related charges, parking, notary charges, research charges, cell phone charges (only if charged by the minute), long distance phone charges, data charges (only if charged based on the amount of data used), text message charges (only if charged by the message), bank fees, accountant fees, and attorneys' fees, all of which must be fairly traceable to the Data Security Incident and must not have been previously reimbursed by a third party.

Residual Funds / Pro Rata Reduction: In the event that Compensation for Out-of-Pocket Losses, Claims Administration Costs, Service Awards to Class Representatives, and Attorney's Fees and Litigation Expenses exceed the Settlement Fund, all Class Member payments will be reduced on a pro rata basis such that Highline's maximum amount to be paid does not exceed the non-reversionary Settlement Fund of \$650,000. If Compensation for Out-of-Pocket Losses, Claims Administration Costs, Service Awards to Class Representatives, and the Attorney's Fees and Litigation Expenses Award do not exceed the Settlement Fund, all remaining funds will be distributed to all Settlement Class Members who submitted a Valid Claim.

## HOW TO GET BENEFITS

### 9. How do I get benefits?

To make a claim for payment from the settlement, you must complete a Claim Form. You may download a copy of the Claim Form at [www.hsddataincident.com](http://www.hsddataincident.com), or you may request one by mail by calling 1-888-468-0613. To complete the Claim Form, please read the instructions carefully, fill out the Claim Form, provide reasonable documentation (where applicable), and submit your Claim online or mail it postmarked no later than **April 20, 2026**, to:

Solis v Highline School District No. 401  
c/o CPT Group, Inc.  
PO Box 19504  
Irvine, CA 92623  
[www.hsddataincident.com](http://www.hsddataincident.com)

### 10. How will claims be decided?

The Claims Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Claims Administrator may request additional information from any Claimant. If the Claimant does not timely respond within thirty (30) days or fails to provide the required information, the Claim will be considered invalid and will not be paid. If the claim is rejected in whole or in part, for any other reason, then the Claims Administrator shall refer the claim to the counsel for the Settling Parties for a joint determination. The Claims Administrator will follow their joint direction regarding the final disposition of the claim.

**Questions? Call 1-888-468-0613 or visit [www.hsddataincident.com](http://www.hsddataincident.com)**

## REMAINING IN THE SETTLEMENT

### 11. Do I need to do anything to remain in the settlement?

You do not have to do anything to remain in the settlement, but if you want a payment, you must submit a Claim Form postmarked or submitted online by **April 20, 2026**.

### 12. What am I giving up as part of the settlement?

By remaining in the settlement, you are agreeing that all of the Court's orders will apply to you, and that you give Highline a "Release." A Release means you cannot sue or be part of any other lawsuit against Highline about the claims or issues in this lawsuit relating to the Data Security Incident, and that you will be bound by the settlement. The specific claims you are giving up against Highline and related persons or entities are called "Released Claims." The Released Claims are defined in the Settlement Agreement, which is available on the settlement website at [www.hsddataincident.com](http://www.hsddataincident.com). The Settlement Agreement describes the Released Claims with specific and accurate legal descriptions, so read it carefully.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this settlement, but you want to keep the right to sue Highline about issues in this case, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself from – or "opting out" of – the Settlement Class.

### 13. If I exclude myself, can I get a payment from this settlement?

No. If you exclude yourself, you will not be entitled to any benefits of the settlement. You will also not be bound by any judgment in this case.

### 14. If I do not exclude myself, can I sue Highline for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Highline for the claims that this settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you exclude yourself, do not submit a Claim Form.

### 15. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a written request stating that you want to be excluded from the settlement in *Y.G.R., V.G.R., minors, by and through their parent and guardian, ANA G. ROBLES SOLIS v. Highline School District NO. 401*, Case No. 25-2-11395-7 SEA (King County, Washington) ("Exclusion Request"). Your Exclusion Request must include your name, address, and signature, and must clearly state your intent to be excluded from the Settlement Class. You must mail your Exclusion Request postmarked by **March 20, 2026**, to:

Solis v Highline School District No. 401  
c/o CPT Group, Inc.  
PO Box 19504  
Irvine, CA 92623  
1-888-468-0613

## THE LAWYERS REPRESENTING YOU

### 16. Do I have a lawyer in this case?

Yes. The Court appointed Timothy W. Emery of Emery Reddy, PLLC, and M. Anderson Berry of Clayco C. Arnold, A Professional Corp. to represent you and other Settlement Class Members. These lawyers are called Settlement Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

### 17. How will Settlement Class Counsel be paid?

If the settlement is approved and becomes final, Settlement Class Counsel will ask the Court to award combined attorneys' fees and costs in the amount of \$214,500 and reimbursement for reasonably incurred litigation expenses. Settlement Class

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Counsel will also request approval of service awards to the Representative Plaintiffs which will not exceed \$15,000 in total and will be allocated to the Representative Plaintiffs. If approved, these amounts, as well as the costs of notice and settlement administration, will be paid separately by Highline and will not reduce the amount of total payments available to Settlement Class members.

## OBJECTING TO THE SETTLEMENT

### 18. How do I tell the Court that I do not like the settlement?

If you are a Settlement Class Member, you can object to the settlement if you disagree with any part of it. You can give reasons why you think the Court should not approve the settlement. The Court will consider your views before making a final decision.

To object, you must file with the Court and mail or email copies to Class Counsel and Highline's counsel a written notice stating that you object to the settlement. Your objection must include all of the following information: (i) your full name and address; (ii) the case name and docket number – *Y.G.R., V.G.R., minors, by and through their parent and guardian, ANA G. ROBLES SOLIS v. Highline School District NO. 401*, Case No. 25-2-11395-7 SEA (Washington State Superior Court for King County); (iii) information identifying yourself as a Settlement Class Member, including proof that you are a Settlement Class Member (e.g., copy of your settlement notice, copy of original notice of the Data Security Incident, or a statement explaining why you believe you are a Settlement Class Member); (iv) a written statement of all grounds for the objection, accompanied by any legal support for the objection you believe applicable; (v) the identity of any and all counsel representing you in connection with the objection; (vi) a statement whether you or your counsel will appear at the Final Fairness Hearing; and (vii) your signature or the signature of your duly authorized attorney or other duly authorized representative (if any) representing you in connection with the objection.

Your written notice of an objection, in the appropriate form, must be mailed, with a postmark date no later than **March 20, 2026**, to all of the following:

Class Counsel	Counsel for Highline
Timothy W. Emery M. Anderson Berry Emery Reddy, PLLC 600 Stewart Street, Suite 1100 Seattle, WA 98101	Amanda Harvey Kayleigh Watson Mullen Coughlin LLC 1452 Hughes Rd, Suite 200 Grapevine, TX 76051

The Court may elect to hear your oral objection, even if you do not follow the above procedure, at the Final Approval Hearing. However, the Parties reserve the right to challenge the objection of any Settlement Class Member who does not follow the above procedure.

### 19. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the settlement and why you do not think the Court should approve it. You can object only if you do not exclude yourself from the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

## THE COURT'S FINAL APPROVAL HEARING

### 20. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing on April 24, 2026, at 9:00 a.m., PT in the King County Superior Court. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. The Court will take into consideration any properly filed written objections and may also listen to people who have asked to speak at the hearing (see Question 18). The Court will also decide whether to approve fees and costs to Settlement Class Counsel, and the service awards to Representative Plaintiffs.

**Questions? Call 1-888-468-0613 or visit [www.hsddataincident.com](http://www.hsddataincident.com)**

### **21. Do I have to attend the Final Approval Hearing?**

No. Settlement Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your own expense, but you are not required to do so. If you send an objection, you do not have to come to the Court to talk about it. As long as you filed your written objection on time with the Court and served it according to the instructions provided in Question 18, the Court will consider it.

### **22. May I speak at the Final Approval Hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file and serve an objection according to the instructions in Question 18, including all the information required.

## **IF YOU DO NOTHING**

### **23. What happens if I do nothing?**

If you do nothing, you will get no monetary benefits from this settlement. Once the Court grants the settlement Final Approval and the judgment becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Highline about the legal issues in this case, ever again.

You must exclude yourself from the settlement if you want to retain the right to sue Highline for the claims resolved by this settlement.

## **GETTING MORE INFORMATION**

### **24. How do I get more information?**

This notice is a summary of the proposed settlement. You can find complete details about the settlement in the Settlement Agreement, available at [www.hsddataincident.com](http://www.hsddataincident.com). You may also:

1. Write to:  
Solis v Highline School District No. 401  
c/o CPT Group, Inc.  
PO Box 19504  
Irvine, CA 92623
2. Visit the settlement website at [www.hsddataincident.com](http://www.hsddataincident.com)
3. Call the toll-free number 1-888-468-0613
4. Email at [hsddataincident@cptgroup.com](mailto:hsddataincident@cptgroup.com).

The address to King County Superior Court, the courthouse to which this case is assigned, is 516 3rd Ave Room W382, Seattle, WA 98104.

**PLEASE DO NOT CALL THE COURT OR THE JUDGE WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.**