
**Notice of Arietis Health, LLC
MOVEit Security Incident Class Action Settlement**

If you received Notice from Arietis Health, LLC that your personally identifying information and/or protected health information was potentially compromised in Arietis Health, LLC’s MOVEit-related security incident, you may receive a payment or other benefits from a class action settlement.

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

Please read this Notice carefully and completely, as your legal rights are affected whether you act or don’t act.

- A Settlement has been proposed in the class action lawsuits against Arietis Health, LLC (“Defendant” or “Arietis”). The Settlement resolves claims against Arietis brought by a group of individuals whose personally identifying information (“PII”) and protected health information (“PHI”) were provided by data owners to Arietis and whose PII and PHI were impacted by the MOVEit security incident, which occurred in May 2023. The MOVEit security incident resulted from an alleged vulnerability in the third-party file transfer software, MOVEit, that Arietis used in its ordinary course of business. Claims against Progress Software Corporation (“Progress”)—the licensor of the MOVEit software—and claims against Anesthesia Consulting & Management, LP (or any of its affiliated entities such as NorthStar Anesthesia) and any other Arietis client have not been resolved and the litigation will continue against those entities.
- Under the proposed Settlement, you may be eligible for one or more of the following (1) reimbursement of out-of-pocket losses incurred due to the security incident, up to \$5,000; (2) reimbursement of \$25 per hour for lost time incurred due to the security incident, up to \$100; and (3) medical data monitoring, credit monitoring, and identity theft protection services. To receive any reimbursement or to sign up for medical fraud and identity theft monitoring, you must complete and timely submit a Claim Form.
- Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make now.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive any of the Settlement benefits.	Online or postmarked by April 3, 2025
EXCLUDE YOURSELF BY OPTING OUT	Get no payment. Keep your right to file your own lawsuit against Arietis for the same claims resolved by this Settlement.	Postmarked by March 4, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	Tell the Court the reasons why you do not believe the Settlement should be approved. You can also ask to speak to the Court at the hearing on April 3, 2025, about the fairness of the Settlement, with or without your own attorney.	Received by March 4, 2025
DO NOTHING	Get no payment and be bound by the terms of the Settlement.	

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement after any appeals are resolved.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

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Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

BASIC INFORMATION

1. Why did I get this Notice?

You received this Notice because you have been identified as a person whose PII and PHI may have been accessed or compromised during Arietis Health, LLC's MOVEit-related security incident involving PII and PHI provided by data owners to Arietis. A group of similarly situated individuals brought eleven proposed class action lawsuits against Arietis in 2023, alleging Arietis was negligent due to its data security practices. Arietis denies the allegations and denies it would be found liable. The parties have now reached a proposed settlement of the lawsuit.

A court authorized this Notice to inform you about your rights under the proposed class action Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the payments the Settlement allows, and the pending legal claims against Arietis and certain others will be released and dismissed.

This package explains the Arietis lawsuits, the Settlement, your rights, what benefits may be available, who is eligible for them, and how to receive them. Judge Allison D. Burroughs of the United States District Court for the District of Massachusetts is in charge of this litigation which is captioned *In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ADB (D. Mass.).

2. What is this lawsuit about?

This matter is a putative class action (the "Litigation") arising from Arietis Health, LLC's MOVEit-related security incident from May 28, 2023, through May 31, 2023, during which cybercriminals gained unauthorized access to the MOVEit file transfer software that was used by Arietis and others, resulting in potential access to and theft of certain PII and PHI provided to Arietis by data owners. The litigation asserts claims against Arietis for alleged negligent data security practices.

Defendant denies any allegation of wrongdoing and denies that Plaintiffs would prevail or be entitled to any relief should this matter proceed to be litigated.

3. What is a class action?

In a class action one or more people called "Class Representative(s)" sue on behalf of themselves and other people who have similar claims. This group of people is called the "Class," and the people in the class are called "Settlement Class Members" or the "Settlement Class." One court resolves the issues for all Settlement Class Members, except for people who exclude themselves from the Class. The person or persons who sued are called the Plaintiff(s). The entity sued—Arietis—is called the Defendant.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendant. Instead, both sides agreed to a settlement. That way, they avoid the costs and risks of a trial, and Settlement Class Members can get benefits or compensation. The Settlement Class Representatives and Class Counsel think the Settlement is in the best interest of the Settlement Class.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class is defined as all persons in the United States who provided their personal information and/or personal health information—including (1) dates of birth; (2) Social Security numbers; (3) driver's license numbers; (4) parent's maiden names; (5) digital signatures; (6) medical record numbers; (7) patient account numbers; (8) Medicare numbers; (9) Medicaid numbers; (10) health insurance account and group numbers; (11) medical history information; (12) medical diagnosis information; (13) medical treatment/procedure information; (14) medical provider information; (15) clinical information; and (16) prescription information—to Arietis, directly or indirectly, and whose personal identifying information and/or personal health information was included in files affected by the MOVEit security incident.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

6. Are there exceptions to being included?

Yes, the following are not included in the Settlement Class (i) Arietis, and Arietis' officers, directors, legal representatives, successors, subsidiaries, and assigns; (ii) any judge, justice, or judicial officer presiding over the Actions and the members of their immediate families and judicial staff; and (iii) any individual who timely and validly opts out of the Settlement.

7. What should I do if I am not sure whether I am included?

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling the Settlement Administrator, Epiq Class Action & Claims Solutions, Inc. ("Epiq") at (844) 717-2961 or by visiting ArietisDataSettlement.com for more information.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

Under the Settlement, Arietis will pay \$2,800,000 into a Settlement Fund which will be used to pay all valid claims made by Settlement Class Members, Notice and administration costs, service awards to the Settlement Class Representatives, and Class Counsel's attorneys' fees and expenses. Settlement Class Members may file a claim for one or more of the following (1) reimbursement of out-of-pocket losses incurred due to the security incident, up to \$5,000; (2) reimbursement of \$25 per hour for lost time incurred due to the security incident, up to \$100; and (3) medical data monitoring, credit monitoring, and identity theft protection services.

9. What can I get from the Settlement?

Settlement Class Members may file a claim for one or more of the following Settlement benefits:

Reimbursement of Out-of-Pocket Losses: In addition to the other claims available under the Settlement, Settlement Class Members may file a claim for reimbursement of up to \$5,000 in compensation for documented monetary losses. In order to receive reimbursement of out-of-pocket losses, the loss must (1) be an actual, documented, and unreimbursed monetary loss; (2) the loss was more likely than not caused by the MOVEit security incident; and (3) the loss occurred between May 31, 2023, and the close of the Claims Period. Any claim for Out-of-Pocket Losses must include sufficient documentation establishing the amount of out-of-pocket losses claimed.

Reimbursement for Time Spent: In addition to the other claims available under the Settlement, Settlement Class Members may submit a claim for \$25 per hour for lost time dealing with the security incident, up to \$100. Settlement Class Members must attest to the lost time and provide a narrative description detailing the time spent in response to the security incident.

Medical Data Monitoring, Credit Monitoring, and Identity Theft Protection Services: In addition to the other claims available under the Settlement, Settlement Class Members may also elect to enroll in four years of medical and credit monitoring services that will include, among other services (a) healthcare insurance plan ID monitoring that tracks and alerts when a plan ID is exposed on the dark web; (b) Medical Record Number (MRN) monitoring that alerts when a medical record number is detected on the dark web; (c) National Provider Identifier (NPI) monitoring to track and alert when registered licensing credentials are found on the dark web; (d) Medicare Beneficiary Identifier (MBI) that alerts when MBI has been disclosed on the dark web; (e) International Classification of Diseases (ICD) monitoring, which notifies when an ICD Code is detected on the dark web; (f) health savings account monitoring, which monitors registered health savings accounts for unusual or unauthorized transactions; and (g) \$1 million of medical identity theft insurance with no deductible. Settlement Class Members who elect to enroll in medical monitoring services will also receive four years of one bureau credit monitoring.

10. What am I giving up if I stay in the Class?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Defendant and other released parties concerning the claims released by this Settlement. The "Releases" section in the Settlement Agreement describes the legal claims you give up if you remain in the Settlement Class. The entire text of the Settlement Agreement can be viewed at ArietisDataSettlement.com.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

HOW TO GET A PAYMENT—MAKING A CLAIM

11. How can I get a payment?

You must complete and submit a Claim Form by April 3, 2025. Claim Forms may be submitted online at ArietisDataSettlement.com or printed from the website and mailed to the address on the form.

Be sure to read the Claim Form instructions carefully, include all required information, and provide your signature.

The Settlement Administrator will review your claim to determine the validity of your payment.

12. How much will my payment be?

The amount of your payment will depend on whether you are seeking out-of-pocket losses, reimbursement for lost time; or medical data monitoring, credit monitoring, and identity theft monitoring.

If you submit a valid claim for out-of-pocket losses, you may receive the amount of your documented losses, up to \$5,000. To document your losses, you must enclose or upload documentation sufficient to show (1) the amount of unreimbursed loss that you suffered, and (2) why you believe the loss is reasonably attributable to the MOVEit security incident. Documents for financial expenses may include credit card or bank statements, emails, invoices, receipts, or telephone records, including photographs of the same. Personal statements or declarations are not considered reasonable documentation, but they may be used to provide clarification, context, or support for other documentation.

If you submit a valid claim for lost time, you may receive \$25 per hour for each hour you spent in response to Arietis's MOVEit-related security incident, up to \$100. To support a claim for lost time, you must attest to the amount of time spent and provide a narrative description of the time spent in response to the security incident.

If you submit a valid claim for medical data monitoring, credit monitoring, and identity theft protection services, you will not receive any payment from the Settlement Fund unless you also submit a claim for out-of-pocket losses, lost time, or both.

13. When will I get my payment?

The Court will hold a Final Approval Hearing on April 3, 2025, at 10:00 a.m., to decide whether to approve the Settlement. Benefits will be made available after the Settlement is approved and becomes final (meaning there is no appeal from the order approving the Settlement or all appeals have been rejected). Updates regarding the Settlement will be posted on the Settlement Website, ArietisDataSettlement.com.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The Court appointed E. Michelle Drake of Berger Montague, PC; Gary F. Lynch of Lynch Carpenter, LLP; Douglas J. McNamara of Cohen Milstein Sellers & Toll PLLC; Karen H. Riebel of Lockridge Grindal Nauen PLLP; Kristen A. Johnson of Hagens Berman Sobol Shapiro LLP; and Charles E. Schaffer of Levin Sedran & Berman LLP as attorneys to represent the Settlement Class. These lawyers are called Class Counsel. You will not be charged for their services.

15. Should I get my own lawyer?

If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

16. How will the lawyers be paid?

The attorneys representing the Settlement Class have not yet received any payment for their legal services or any reimbursement of the costs or out-of-pocket expenses they have incurred. Class Counsel plans to ask the Court for an award of attorneys' fees and expenses of up to twenty-five percent of the Settlement Fund. Class Counsel will file their request for attorneys' fees and expenses as a percentage of the Settlement Fund.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

The Settlement Class is represented by the named plaintiffs (the “Settlement Class Representatives”). In addition to the benefits that the Settlement Class Representatives will receive as members of the Settlement Class—and subject to the approval of the Court—Class Counsel will request service awards, not to exceed \$2,500 each, to each of the Settlement Class Representatives for the efforts they have expended on behalf of the Settlement Class.

The Court will determine whether to approve the attorneys’ fees and expenses requested by Class Counsel and the proposed Service Awards for the Class Representatives. Class Counsel will file an application for attorneys’ fees and expenses, and service awards no later than December 21, 2024. The application will be available on the Settlement Website, ArietisDataSettlement.com, or you can request a copy by contacting the Settlement Administrator.

EXCLUDING YOURSELF FROM THE SETTLEMENT

17. How do I get out of the Settlement?

If you are a Settlement Class Member and you do not want the benefits from the Settlement, and you want to keep your right, if any, to sue Defendant on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from—or “opting out” of—the Settlement Class.

You may opt out of the Settlement by March 4, 2025. To opt out, you must send a letter or postcard via U.S. Mail to the address below. You must include the following in your letter or postcard:

- the name of this litigation, or a decipherable approximation (*In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ADB [D. Mass.] [Arietis Actions]);
- your full name, address, telephone number, and signature;
- the words “Opt Out” or “Requests for Exclusion” at the top of the document or a statement that you want to opt out of the Settlement; and
- if you are filing a request for exclusion on behalf of an incapacitated or deceased Settlement Class Member for whom you are legally authorized to act, you must include your name, address, phone number, signature, and relationship to the Settlement Class Member, as well as that person’s name and address.

You must mail your opt-out request via First-Class postage prepaid U.S. Mail, postmarked no later than March 4, 2025 to:

MOVEit- Arietis Health Settlement Administrator
P.O. Box 5765
Portland, OR 97228-5765

If you fail to include the required information, your request will be deemed invalid, and you will remain a Settlement Class Member and be bound by the Settlement, including all releases.

18. If I am a Settlement Class Member and don’t opt out, can I sue the Defendant for the same thing later?

No. You must opt out of the Settlement to keep your right to sue Defendant or other released parties for any of the claims resolved by the Settlement.

19. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class. You cannot submit a Claim Form, and you will not receive any benefits included in the Settlement. You will not be bound by the Settlement, releases, or by any further orders or judgments in this case. You will keep the right, if any, to sue on the claims alleged in the case at your own expense.

In addition, if you opt out of the Settlement, you cannot object to this Settlement because the Settlement no longer affects you. If you object to the Settlement and request to exclude yourself, your objection will be voided, and you will be deemed to have excluded yourself.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

20. How do I tell the Court I don't like the Settlement?

If you are a Settlement Class Member and you do not opt out of the Settlement, you can object to the Settlement if you do not think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. You cannot ask the Court to change or order a different settlement; the Court can only approve or deny this Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

You may object to any part of the proposed Settlement in writing. You may also appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney.

Your objection must be in writing and must follow these steps:

- clearly identify the case name and number (*In re: MOVEit Customer Data Security Breach Litig.*, MDL No. 1:23-md-03083-ADB [D. Mass.] [Arietis Actions]);
- include your full name, address, telephone number, and email address;
- include the full name, address, telephone number, and email address of your counsel (if you are represented by counsel);
- state whether the objection applies only to you, to a specific subset of the Class, or to the entire Class, and also state with specificity the grounds for the objection;
- confirm whether you intend to personally appear and/or testify at the Final Approval Hearing and if so, whether you are or will be represented by counsel; and
- provide your signature and the signature of your duly authorized counsel or other duly authorized representative.

Any objection must be either filed electronically with the Court or mailed to the Clerk of Court, and the Settlement Administrator at the addresses set forth below. The objection must be filed with the Court—or if mailed it must be postmarked—no later than March 4, 2025.

United States District Court for the District of Massachusetts Clerk of Court John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2300 Boston, Massachusetts 02210	MOVEit- Arietis Health Settlement Administrator P.O. Box 5765 Portland, OR 97228-5765
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21. What's the difference between objecting and opting out?

Objecting is telling the Court you don't like something about the Settlement. You can object to the Settlement only if you are a Settlement Class Member and do not opt out of the Settlement. Opting out of the Settlement is telling the Court you don't want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it does not affect you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at 10:00 a.m. on April 3, 2025, in Courtroom 17, 5th Floor at the federal courthouse located at 1 Courthouse Way, Boston, Massachusetts 02210 before Judge Allison D. Burroughs. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate; Class Counsel's application for attorneys' fees and expenses; and whether to approve the Service Awards for the Settlement Class Representatives. If there are objections, the Court will consider them. The Court may choose to hear from people who have asked to speak at the hearing. At or after the hearing, the Court will decide whether to approve the Settlement. There is no deadline by which the Court must make its decision.

Questions? Go to ArietisDataSettlement.com or call (844) 717-2961.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to the Settlement Class Members. Be sure to check the website, [ArietisDataSettlement.com](https://arietisdata.com), for updates. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>.

Class Counsel will file a motion for final approval of the Settlement by March 4, 2025. Objectors, if any, must file any response to Class Counsel's motion by March 17, 2025. Responses to any objections and any replies in support of final approval of the Settlement and/or Class Counsel's application for attorneys' fees, costs, and expenses, and Service Awards will be filed by March 24, 2025.

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

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk about it. As long as you mailed or filed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

24. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a statement in your written objection (*see* Question 20) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well. You cannot speak at the hearing if you opt out or exclude yourself from the Class.

IF I DO NOTHING

25. What happens if I do nothing?

If you are a Settlement Class Member and do nothing, you will not get any money from this Settlement, and you will not be able to sue the Defendant or other released parties for the claims released by the Settlement Agreement.

GETTING MORE INFORMATION

26. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement and other case documents available at [ArietisDataSettlement.com](https://arietisdata.com). You may also access the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.mad.uscourts.gov>, or visit the office of the Clerk of the Court for the United States District Court for the District of Massachusetts, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

27. How do I get more information?

Visit the website, [ArietisDataSettlement.com](https://arietisdata.com), where you will find more information, including the Claim Form, a copy of the Settlement Agreement, and answers to questions about the Settlement and other information to help you determine whether you are eligible for a payment.

Contact the Settlement Administrator, Epiq, at (844) 717-2961 or by writing to:

MOVEit- Arietis Health Settlement Administrator
P.O. Box 5765
Portland, OR 97228-5765

Speak with Class Counsel by calling (412) 322-9343 or by writing to Arietis Health Class Action, Lynch Carpenter, LLP, Attn: Gary F. Lynch, 1133 Penn Avenue, 5th Floor, Pittsburgh, PA 15222.

PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE, OR DEFENDANT TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Questions? Go to [ArietisDataSettlement.com](https://arietisdata.com) or call (844) 717-2961.