

Exhibit 2

PROPOSED SETTLEMENT BENEFITS PLAN

1. Capitalized Terms. Unless defined herein, the capitalized terms used in this Proposed Settlement Benefits Plan (“Benefits Plan”) are defined in the Settlement Agreement and Release.
2. Settlement Payments. The Settlement Administrator will pay Approved Claims from the Net Settlement Fund in the following manner:
 1. Reimbursement of Out-Of-Pocket Losses. In addition to other claims available under the Settlement, Settlement Class Members who submit an attested claim for reimbursement of Out-of-Pocket Losses may submit a claim up to \$5,000.00 per individual for documented out-of-pocket losses. To receive reimbursement of extraordinary losses, the out-of-pocket 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. The categories of reimbursable out-of-pocket losses includes:
 - a) Unreimbursed fraud suffered;
 - b) Long distance telephone charges;
 - c) Cell phone minutes (if charged by the minute);
 - d) Internet usage charges (if charged by the minute or incurred solely as a result of the data incident;
 - e) Credit monitoring or fraud resolution services;
 - f) Costs of credit reports;
 - g) Bank or other financial institution charges incurred as a result of the data incident; or

h) Other losses directly and reasonably incurred as a result of the data incident

2. Reimbursement for Time Spent Claims. In addition to other claims available under the Settlement, Settlement Class Members may submit a claim for time spent investigating, responding to, or otherwise addressing the data incident at \$25.00 per hour up to a maximum of four hours upon attestation that the time was spent dealing with the consequences of the data incident and a narrative of the time spent.

3. Medical Data and Credit Monitoring and Identity Theft Protection Services. In addition to both of the forgoing claims, Settlement Class Members may also elect to enroll in four (4) 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.

3. Timing of Settlement Payments. Within sixty (60) days of the Effective Date, the Settlement Administrator shall: (1) issue all payments for out-of-pocket losses based on Approved Claims for Out-of-Pocket Losses; (2) issue all payments for lost time based on Approved Claims for Lost Time; (2) issue a unique redemption code allowing each Settlement Class Members who submitted an Approved Claim for medical data monitoring, credit monitoring, and identity theft protection to enroll in the services.
 - a. Settlement Class Members who make a claim for medical data monitoring, credit monitoring, and identity theft protection services but never activate their services, as well as Settlement Class Members who do not submit a claim, will still be deemed Plaintiff Released Parties and will be deemed to have released all claims against Defendant Released Parties as outlined in the Settlement Agreement.

4. Insufficient or Residual Funds.
 - a. If the total value of all Approved Claims exceeds the Net Settlement Fund available for distribution to Settlement Class Members, the duration of the claimed medical, credit, and identity theft monitoring services will be reduced *pro rata* to the longest duration that will allow all Approved Claims to be paid using the Net Settlement Fund.
 - b. If the total value of all Approved Claims is less than the Net Settlement Fund available for distribution to Settlement Class Members, the duration of the claimed medical, credit, and identity theft monitoring services will be increased *pro rata* to the longest duration that will allow all Approved Claims to be paid using the Net Settlement Fund.

c. If, after the *pro rata* increase in the duration of medical, credit, and identity theft monitoring pursuant to § 4.b. above, the Net Settlement Fund retains additional funds that would be insufficient to further increase the duration of medical, credit, and identity theft monitoring services, then: (1) the remaining Net Settlement Fund shall be distributed *pro rata* to Settlement Class members who submitted approved Claims for reimbursement of out-of-pocket losses, time spent, or both, unless the administrative costs of disbursing the funds exceeds the amount in the remaining Net Settlement Fund; and (2) if the administrative costs of disbursing the funds exceeds the amount in the remaining Net Settlement Fund, the remaining Net Settlement Fund shall be distributed to a *cypres* recipient, as approved by the Court.

5. Unclaimed Reimbursements of Approved Claims.

a. If any amount paid to Settlement Class Members for approved Out-of-Pocket Loss Claims or Lost Time Claims is unclaimed (“Unclaimed Funds”), those funds shall be allocated as follows:

1. The Unclaimed Funds shall be used, if sufficient, to extend the duration of the medical, credit, and identity theft monitoring services to the longest duration allowable with the amount of Unclaimed Funds;
2. Any amount of Unclaimed Funds remaining after extending the duration of medical, credit, and identity theft monitoring services shall be distributed *pro rata* to Settlement Class members who submitted approved Claims for reimbursement of out-of-pocket losses, time spent, or both, except for those whose reimbursements

were unclaimed and only if the administrative costs of distributing the Unclaimed Funds does not exceed the value of the Unclaimed Funds;

3. If the administrative costs of disbursing the Unclaimed Funds exceed the amount of Unclaimed Funds, the remaining Unclaimed Funds shall be distributed to a *cy pres* recipient, as approved by the Court.