

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In the United States District Court for the Central District of California
Omar Bolanos and Caren Luke v. Crossroads Equipment Lease & Finance, LLC, Case No. 5:24-cv-00552-JGB-SP

IF YOUR PERSONAL INFORMATION WAS POTENTIALLY IMPACTED BY A CYBERSECURITY INCIDENT THAT CROSSROADS EQUIPMENT LEASE & FINANCE, LLC EXPERIENCED IN APRIL 2023, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS.

*A federal court authorized this Notice. You are not being sued.
 This is not a solicitation from a lawyer.*

- A settlement has been reached with Crossroads Equipment Lease & Finance, LLC (“Crossroads”) in a class action lawsuit about a cybersecurity incident that occurred in or around April 2023 (“Security Incident”).
- The lawsuit is captioned *Omar Bolanos and Caren Luke v. Crossroads Equipment Lease & Finance, LLC*, 5:24-cv-00552-JGB-SP (In the United States District Court for the Central District of California). Defendant denies the allegations and all liability or wrongdoing with respect to any and all facts and claims alleged in the lawsuit but has agreed to a settlement to avoid the costs and risks associated with continuing this case.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is an individual who resides in the United States, to whom Defendant sent a notice concerning the Security Incident and whose personal information was impacted by the cybersecurity incident that affected Crossroads in or around April 2023.
- As a Settlement Class Member, your rights are affected whether you act or don’t act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive cash and other benefits from this Settlement is by submitting a valid and timely Claim Form. You can submit your Claim Form online at CrossroadsDataBreachSettlement.com or mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	November 3, 2025
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can elect to retain your own legal counsel at your own expense. If you opt out, you will not be able to participate in the cash and other benefits from the Settlement.	September 5, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don’t like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for benefits.	September 5, 2025
DO NOTHING	Unless you opt out of the Settlement, you are part of the Settlement. If you do nothing, you will not get a payment from this Settlement, and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	2
WHO IS IN THE SETTLEMENT?.....	3
THE SETTLEMENT BENEFITS	3
HOW TO GET A PAYMENT—MAKING A CLAIM	4
THE LAWYERS REPRESENTING YOU.....	4
EXCLUDING YOURSELF FROM THE SETTLEMENT	5
COMMENTING ON OR OBJECTING TO THE SETTLEMENT.....	5
THE COURT’S FINAL APPROVAL HEARING	6
IF I DO NOTHING.....	6
GETTING MORE INFORMATION.....	6

BASIC INFORMATION

1. Why was this Notice issued?

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

The lawsuit is captioned *Omar Bolanos and Caren Luke v. Crossroads Equipment Lease & Finance, LLC*, 5:24-cv-00552-JGB-SP (In the United States District Court for the Central District of California). The people who filed this lawsuit are called the “Plaintiffs,” and the company they sued, Crossroads Equipment Lease & Finance, LLC, is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that personal information was impacted by the cybersecurity incident that affected Crossroads Equipment Lease & Finance, LLC in or around April 2023 (“Security Incident”).

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as “class representatives” or “plaintiffs.” Together, the people included in the class action are called a “class” or “class members.” One court resolves the lawsuit for all settlement class members, except for those who exclude themselves (sometimes called “opting out”) from a settlement. In this Settlement, the Class Representatives are Omar Bolanos and Caren Luke.

4. Why is there a settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. The Defendant denies all claims and contends that they have not violated any laws. Plaintiffs and the Defendant agreed to a settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible for claim payments and other benefits. The Plaintiffs and their attorneys, who also represent the Settlement Class Members, think the Settlement is best for all Settlement Class Members

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals who reside in the United States and to whom Defendant sent a notice concerning the Security Incident.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are (i) Crossroads Equipment Lease & Finance, LLC, its officers, and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) any judges assigned to this case and their staff and family; and (iv) any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the criminal activity occurrence of the Security Incident or who pleads *nolo contendere* to any such charge.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling, emailing, or writing to the Settlement Administrator at the following:

1-888-820-1005 (Toll-Free)

info@CrossroadsDataBreachSettlement.com

Crossroads Equipment Lease & Finance, LLC Security Incident
c/o Epiq
Settlement Administrator
P.O. Box 5689
Portland, OR 97228-5689

You may also view the Settlement Agreement and Release (“Settlement Agreement”) at CrossroadsDataBreachSettlement.com.

THE SETTLEMENT BENEFITS

7. What can I get?

If approved by the Court, Defendant will establish a Settlement Fund of \$425,000.00 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses, attorneys’ fees and costs, and any service awards. If you received a notice from Defendant concerning the Security Incident, you may claim (i) up to \$1,000.00 in documented out-of-pocket losses incurred as a result of the Security Incident; (ii) a pro rata cash payment estimated at \$50.00 and capped at \$300.00; and (iii) two years of one-bureau credit monitoring services and identity protection services by choosing this benefit on the Claim Form. Even if Settlement Class Members previously accepted the Defendant’s offer of complimentary credit monitoring services, they may still claim this benefit. To the extent the number of claims made exceeds the amount of the Settlement Fund after expenses are deducted for service fees, Settlement Class Counsel payments, and administrative costs, you will receive a pro rata share of the Settlement Fund that remains.

8. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at CrossroadsDataBreachSettlement.com.

HOW TO GET A PAYMENT—MAKING A CLAIM

9. How do I submit a claim and get a cash payment?

Claim Forms may be submitted online at CrossroadsDataBreachSettlement.com or mailed to the Settlement Administrator at:

Crossroads Equipment Lease & Finance, LLC Security Incident
 c/o Epiq
 Settlement Administrator
 P.O. Box 5689
 Portland, OR 97228-5689

You may also contact the Settlement Administrator to request a Claim Form by telephone at 1-888-820-1005, by email at info@CrossroadsDataBreachSettlement.com, or by U.S. Mail at the address above.

10. What is the deadline for submitting a claim?

If you submit a claim by U.S. Mail, the completed and signed Claim Form must be postmarked by **November 3, 2025**. If submitting a Claim Form online, you must also do so by **November 3, 2025**.

11. When will I get my payment?

The short answer is after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold the Final Approval Hearing on **November 17, 2025**, to decide whether to approve the Settlement, how much attorneys’ fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award service awards to the Class Representatives who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement payments will be distributed as soon as possible, if and when the Court grants final approval to the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

Yes, the Court appointed Scott Edelsberg of Edelsberg Law, P.A., and Raina Borrelli of Strauss Borrelli PLLC to represent you and other members of the Settlement Class (“Settlement Class Counsel”). You will not be charged directly for these lawyers; instead, they will receive compensation from Defendant (subject to Court approval).

13. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Settlement Class Counsel’s attorneys’ fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the Court of no more than \$141,652.50 in attorneys’ fees and \$20,000.00 in reasonable expenses. Settlement Class Counsel is entitled to seek no more than one third of the Settlement Fund for these items, subject to Court approval. As approved by the Court, the Settlement Class Representatives will each be paid a service award from the Settlement Fund for bringing and settling the case. The Settlement Class Representatives will seek no more \$5,000.00 each as a service award, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out” of the Settlement Class. The deadline for requesting exclusion from the Settlement is **September 5, 2025**.

To exclude yourself from the Settlement, you must submit a written request for exclusion to the Court that includes the following information:

- the case name: *Omar Bolanos and Caren Luke v. Crossroads Equipment Lease & Finance, LLC*, 5:24-cv-00552-JGB-SP (In the United States District Court for the Central District of California);
- your full name;
- current address;
- personal signature; and
- the words “Request for Exclusion” or a comparable statement that you do not wish to participate in the Settlement.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **September 5, 2025**.

Crossroads Equipment Lease & Finance, LLC Security Incident Settlement Administrator
ATTN: Exclusion Request
P.O. Box 5689
Portland, OR 97228-5689

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You may only exclude yourself—not any other person.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

16. How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement benefits, the request for attorneys’ fees or service awards, the releases provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

For an objection to be considered by the Court, the objection must include: (i) the name of the proceedings; (ii) the Settlement Class Member’s full name and current mailing address; (iii) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection; (iv) the identity of any attorneys representing the objector; (v) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; and (vi) the signature of the Settlement Class Member or the Settlement Class Member’s attorney.

Any Settlement Class Member who does not file a timely and adequate objection in accordance with the above paragraph waives the right to object to the Settlement at the Final Approval Hearing and shall be bound by the terms of the Settlement Agreement and by all orders and judgments in the Action.

Objections must be filed with the Court no later than **September 5, 2025**.

Clerk of the Court
350 W 1st Street, Suite 4311
Los Angeles, CA 90012

A copy of your objection also must be mailed to the Settlement Administrator at the address below, postmarked no later than **September 5, 2025**.

Crossroads Equipment Lease & Finance, LLC Security Incident Settlement Administrator
ATTN: Objections
P.O. Box 5689
Portland, OR 97228-5689

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

18. When is the Court's Final Approval Hearing?

The Court is scheduled to hold the Final Approval Hearing on **November 17, 2025, at 9:00 a.m. PT** in Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, located at 3470 12th Street, Riverside, CA 92501, to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a Service Award Payment to each Class Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost. If you do not like the Settlement, remember, you may object to it, but you have to follow certain requirements (see Question 16). The date and time of this hearing may change without further notice. Please check CrossroadsDataBreachSettlement.com for updates.

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

No. Settlement Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an objection, you may, but you do not have to, come to the Final Approval Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider an objection that was filed on time and meets the requirements above.

IF I DO NOTHING

20. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the releases of the Released Parties in the Settlement and not be eligible to receive a payment from this Settlement.

GETTING MORE INFORMATION

21. 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 the Settlement Website, CrossroadsDataBreachSettlement.com.

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: info@CrossroadsDataBreachSettlement.com

Toll-Free: 1-888-820-1005

Mail: *Crossroads Equipment Lease & Finance, LLC Security Incident*
c/o Epiq
Settlement Administrator
P.O. Box 5689
Portland, OR 97228-5689

Publicly filed documents can also be obtained by visiting the United States District Court for the Central District of California or by reviewing the Court's online docket. For those planning to visit the Court for more information, please contact the Court for its regular business hours and for any costs associated with obtaining documents maintained by the Court.

You may also contact your counsel in this matter, the Settlement Class Counsel, as follows:

Scott Edelsberg
EDELBERG LAW, PA
scott@edelsberglaw.com

Raina Borrelli
STRAUSS BORRELLI PLLC
raina@straussborrelli.com

PLEASE DO NOT CONTACT THE COURT OR CROSSROADS EQUIPMENT LEASE & FINANCE, LLC.