

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA ROSSI, DELILAH PARKER, and
KELVIN HOLMES, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

CLAIRE'S STORES, INC.; CLAIRE'S
BOUTIQUES, INC.; and CBI
DISTRIBUTING CORP.,

Defendants.

Case No. 1:20-cv-05090

**DECLARATION OF
TERESA Y. SUTOR OF RG/2
CLAIMS ADMINISTRATION LLC
IN SUPPORT OF FINAL APPROVAL
OF SETTLEMENT**

I, Teresa Y. Sutor, hereby declare and state as follows:

1. I am a Project Manager of RG/2 Claims Administration LLC, the Settlement Administrator appointed in the above-captioned case, whose principal office is located at 30 South 17th Street, Philadelphia, PA 19103. I am over the age of 21 and am authorized to make this declaration on behalf of RG/2 and myself. The following statements are based on my personal knowledge and information provided by other experienced RG/2 employees working on this case. This declaration is being filed in support of the pending motion for final approval of the class action settlement in this matter.

2. RG/2 is a full-service class action settlement administrator that provides, among other things, notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2's experience includes the provision of notice and administration services for numerous settlements relating to antitrust, consumer fraud, civil rights, employment, negligent disclosure, and securities fraud class action lawsuits. Since 2000,

RG/2 has administered and distributed in excess of \$1.8 billion in class action settlement proceeds.

3. RG/2 was appointed as the Settlement Administrator to provide notification and administration services in connection with a settlement agreement (the “Settlement Agreement”) entered into in connection with the *Julia Rossi, Delilah Parker, and Kevin Holmes v. Claire’s Stores, Inc., Claire’s Boutiques, Inc. and CBI Distributing Corp.* matter referred to herein as the “Settlement.” RG/2’s duties in this action have included and will continue to include: (a) receiving and analyzing the potential Settlement Class Member contact list (the “Class List”) from defense counsel; (b) creating a website with online claim filing capabilities; (c) establishing a toll-free number; (d) establishing a mailing address for the receipt of mail; (e) preparing and sending the Settlement Class Notice via Email and First Class Mail; (f) receiving and processing undeliverable mail from the United States Postal Service (“USPS”), with and without forwarding addresses; (g) receiving and processing Claim Forms; (i) receiving and processing opt outs; and (j) such other tasks as counsel for the Parties or the Court request RG/2 perform.

4. RG/2 received a data file of potential Settlement Class Members from Defendants on April 5, 2022 that contained 60,559 unique records with names, mailing addresses, and email addresses.

5. RG/2 created a dedicated Settlement website entitled www.cyberattacklitsettlement.com (the “Settlement Website”). The Settlement Website “went live” on April 27, and contains details of the Settlement, all related court documents, the time and date of the Final Approval Hearing, copies of the Notices, and allows Settlement Class Members an opportunity to file a Claim Form online. A true and correct copy the Long-Form Notice, Claim Form and Short-Form Notice, each of which were posted to the Settlement Website, are attached hereto as **Exhibits A, B, and C**, respectively. As of September 6, 2022, the website has received

19,000 unique visits.

6. On April 27, 2022, the toll-free phone number for Settlement Class Members to obtain information or speak with an operator went live. Settlement Class Members can also submit a request to have a notice and/or claim form mailed to them through the automated system. As of September 6, 2022, the toll-free line has received 7 calls.

7. On April 6, 2022, RG/2 obtained a post office box with the mailing address *Claire's Settlement* c/o RG/2 Claims Administration LLC, PO Box 59479, Philadelphia, PA 19102-9479, in order to receive requests for exclusion, Claim Forms, objections, and correspondence from Settlement Class Members.

8. On April 29, 2022, RG/2 arranged for the Short-Form Notice to be emailed to 60,559 Settlement Class Members who were identified as having valid email addresses. To prevent Claim Forms being filed by individuals outside of the Settlement Class and to curtail fraud, the Short-Form Notices also provided potential Settlement Class Members with a unique Settlement Class Member Login and Password on their respective Notice. The Settlement Class Member Login and Password is required for a Settlement Class Member to file a Claim Form online.

9. Of the 60,559 emails, 712 were undeliverable, 657 emails bounced and 933 emails were bad, incomplete or missing email addresses, for a total of 2,302 undeliverable emails. 58,257 emails were successfully delivered.

10. On May 12, 2022, R/G2 caused 2,302 Short Form Notices to be mailed via First Class Mail to parties with undeliverable or missing emails. The Short Form Notices directed Settlement Class Members to the Settlement Website to obtain additional information and to file a claim. To prevent the filing of Claim Forms by individuals outside of the Settlement Class and to curtail fraud, the postcard Short Form Notices also provided potential Settlement Class

Members with a unique Settlement Class Member Login and Password on their respective Notices. The Settlement Class Member Login and Password is required for Settlement Class Members to file a Claim Form online.

11. As of September 6, 2022, RG/2 has received 107 of the mailed Short Form Notices returned as undeliverable by the USPS. Of the 107 returned notices, 7 Short-Form Notices were returned with forwarding addresses for the Settlement Class Members, and a new Short Form Notice was promptly re-mailed to those Settlement Class Members. Through standard skip-tracing procedures, RG/2 mailed new Short-Form Notices to 56 Settlement Class Members for whom updated addresses were located.

12. The Short-Form Notice advised Settlement Class Members of their right to exclude themselves from the Settlement and that their request must be postmarked by August 25, 2022. As of September 6, 2022, RG/2 Claims has received 1 timely-filed request for exclusion and 0 late submissions. This Request for Exclusion is identified in Exhibit D, attached hereto.

13. The Short Form Notice also advised Settlement Class Members of their right to object to the Settlement and that their objection must be filed with the Court by August 25, 2022. To date, and to RG/2's knowledge, no timely objections have been filed with the Court.

14. The Notice advised Class Members that they had until September 24, 2022 to either submit a claim through the claims portal or have their mailed Claim Form postmarked on or before September 24, 2022.

15. On July 1, 2022, RG/2 arranged to have a Reminder Email sent to 58,256 Class Members who had not filed a claim, had an invalid email address and/or were mailed a notice. The reminder email was the Short-Form Notice identified in Exhibit C, with a subject line of "Claire's Stores – Reminder Email."

16. Through September 6, 2022, RG/2 has received a total of 320 timely paper and electronic Claims.

17. RG/2 sent separate notification emails to all Class Members at the commencement of the notice period to sign up for a complimentary one-year membership of Experian Identity Works, regardless of whether they participate in the Settlement. Activation emails will be sent to those Class Members who signed up on the Effective Date of the Settlement.

18. RG/2 is currently reviewing all claim forms submitted and communicating with Class Members who submitted either deficient or denied claims. RG/2 will be making final determinations and applying caps of the claims filed upon review; thus, the final claims value is not yet known.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

September 6, 2022

Teresa Y. Sutor

TERESA Y. SUTOR

Exhibit A

If you made an online purchase with Claire’s Stores, Inc. between April 7, 2020 and June 12, 2020 using a credit, debit, or other payment card, you may be eligible for a payment from a class action settlement.

A Settlement has been reached with Claire’s Stores, Inc., Claire’s Boutiques, Inc., and CBI Distributing Corp. (collectively “Claire’s”) in a class action lawsuit about a data security incident that occurred between April 7, 2020, and June 12, 2020, which potentially exposed payment card data of customers. The lawsuit alleges that Claire’s was responsible for the Data Incident because Claire’s did not take appropriate care to protect its eCommerce platform from hacking. Claire’s denies the claims and denies any wrongdoing.

Who Is Included?

Claire’s records show you are a likely member of the Settlement Class. The Settlement includes all persons residing in the United States who used a credit, debit, or other payment card to make an online purchase with Claire’s between April 7, 2020 and June 12, 2020.

What Can I Get?

The Settlement entitles you to a complimentary one-year membership of Experian’s® IdentityWorksSM. To sign up to receive an email reminder to advise when the redeemable code becomes active, log on to www.cyberattacklitsettlement.com using the Login and Password provided below, and enter redeemable **code XXXXXXXX**, your name and email address on the page following your login. **Please note this one-year membership is available after the Effective Date of the settlement and does not require a Claim Form submission.**

The Settlement also will reimburse people who submit claims for:

- (1) Out-of-pocket expenses and compensation for documented lost time that resulted from the Security Incident, **up to \$250**; and
- (2) Extraordinary expenses **up to \$3,000** that were likely caused by the Security Incident.

If you are a Settlement Class Member and you want to receive an Award, **you must complete and submit a Claim Form along with any required supporting information.** Claim Forms can be found and completed on www.cyberattacklitsettlement.com. The deadline to submit a Claim Form is **September 24, 2022**. **You must use the following Login and Password to access the online Claim Form:**

Login: XXXXXXXX Password: XXXXXX

As part of the Settlement, Claire’s has also committed to establish and maintain data security enhancements related to its eCommerce platform and customer data.

What are my rights?

Do Nothing. You will be legally bound by decisions of the Court and you give up the right to sue Claire’s for the claims in this case.

Exclude Yourself. If you exclude yourself, you will not be legally bound by the Settlement and you keep your right to sue. However, you will not get any money. You must submit your exclusion request by August 25, 2022.

Object. You can stay in the Settlement and tell the Court why you do not like the Settlement. Objections must be submitted by August 25, 2022.

Detailed instructions on how to exclude yourself or object to the Settlement are found in the long notice available at www.cyberattacklitsettlement.com or by calling 1-866-742-4955.

When Will the Court Approve the Settlement?

The Court will hold a Final Approval Hearing on September 27, 2022 **at 10:00 a.m.** at the United States District Court for the Northern District of Illinois (Eastern Division) located at Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, to consider whether to approve the settlement. The Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for attorneys' fees, costs, and expenses of \$165,000 and an incentive award of \$1,500 for each of the Representative Plaintiffs. You or your own lawyer may ask to appear at the hearing to be heard by the Court, but you do not have to. The motion for attorneys' fees and costs and service awards for the Representative Plaintiffs will be posted on the settlement website (www.cyberattacklitsettlement.com) after it is filed with the Court.

This is only a summary. For detailed information visit www.cyberattacklitsettlement.com or call **1-866-742-4955**. You may contact the Settlement Administrator at Claire's Settlement, c/o Claims Administrator, PO Box 59479, Philadelphia, PA 19102-9479.

www.cyberattacklitsettlement.com

1-866-742-4955

Exhibit B

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you made an online purchase with Claire’s between April 7, 2020 and June 12, 2020 using a credit, debit, or other payment card, you may be eligible for a payment from a class action settlement.

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

A Settlement has been reached with Claire’s Stores, Inc., Claire’s Boutiques, Inc., and CBI Distributing Corp. (collectively “Claire’s” or “Defendants”), in a class action lawsuit about a data security incident that occurred between April 7, 2020 and June 12, 2020.

During the Data Incident, Claire’s suffered a cyberattack on its eCommerce platform that accepts payment cards (the “Data Incident”). The Data Incident potentially resulted in unauthorized access to customer payment card data, including first and last names, shipping addresses, billing addresses, credit or debit card numbers including expiration dates and card verification values, and/or bank account numbers. Subsequently, a class action lawsuit was filed asserting claims against Claire’s relating to the Data Incident.

The Settlement includes all persons residing in the United States who used a credit, debit or other payment card to make an online purchase with Claire’s between April 7, 2020 and June 12, 2020.

The Settlement also provides for a complimentary one-year membership of Experian’s® IdentityWorksSM. **Settlement Class Members do not need to file a claim to take advantage of this membership.**

The Settlement also provides payments to people who submit valid claims for out-of-pocket expenses and charges that were incurred and plausibly arose from the Data Incident, and for other extraordinary unreimbursed monetary losses.

Your legal rights are affected even if you do nothing. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
Submit a Claim	The only way to get a payment. You must submit a claim by September 24, 2022.
Ask to be Excluded	Get no payment. This is the only option that allows you to sue Claire’s over the claims resolved by this Settlement. You must exclude yourself by August 25, 2022.
Object	If you do not ask to be excluded, you may write to the Court about why you do not like the Settlement. You must object by August 25, 2022.
Do Nothing	Get no payment. Give up rights.

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 grant final approval of the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals are resolved.

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

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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 lawsuit 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 Andrea R. Wood of the United States District Court for the Northern District of Illinois (Eastern Division) is overseeing this case. The case is known as *Rossi et. al. v. Claire’s Stores, Inc. et. al.*, Case No. 1:20-cv-05090. The persons who sued are called the Plaintiffs. Claire’s Stores, Inc., Claire’s Boutiques, Inc., and CBI Distributing Corp. (collectively “Claire’s”), are called the Defendants.

2. What is this lawsuit about?

The lawsuit is a proposed class action lawsuit brought on behalf of U.S. residents whose Personal Information may have been accessed and/or compromised by unauthorized individuals as part of the Data Incident. The Data Incident resulted in the potential exposure of payment card data of customers who used a credit or debit card to make a purchase from the Claire’s website. The potentially-exposed information may include customers’ names, billing and shipping addresses, payment card numbers, CVV security codes, and credit card expiration dates.

The lawsuit claims that Claire’s was responsible for the Data Incident and asserts claims such as: violations of the Pennsylvania, Tennessee, and similar state consumer protection statutes; violations of the Tennessee Consumer Information Release Act; violation of the Georgia Security Breach Notification Act; and violation of state common laws of negligence, breach of implied contract, and unjust enrichment. The lawsuit seeks compensation for people who had out-of-pocket expenses, fraudulent charges, lost time spent dealing with fraudulent charges or card replacement issues, or unreimbursed extraordinary monetary losses as a result of the Data Incident.

Claire’s denies all of the Plaintiffs’ claims and maintains that it did not do anything wrong.

3. Why is this lawsuit a class action?

In a class action, one or more people called “Representative Plaintiffs” sue on behalf of all people who have similar claims. All of these people together are the “Class” or “Class Members.” In this case, the Representative Plaintiffs are Julia Rossi, Delilah Parker, and Kelvin Holmes. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class and this Settlement.

4. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid claims will get compensation. The Representative Plaintiffs and their attorneys believe the Settlement is fair, reasonable, and adequate and, thus, best for the Class and its members. The Settlement does NOT mean that Claire’s did anything wrong.

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

WHO IS IN THE SETTLEMENT?

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

You are included in the Settlement Class if you reside in the United States and used a credit, debit or other payment card to make an online purchase with Claire's between April 7, 2020 through June 12, 2020, and you had out-of-pocket expenses, fraudulent charges, lost time spent dealing with fraudulent charges or card replacement issues, or unreimbursed extraordinary monetary losses as a result of the Claire's Data Incident. Your online purchase must have been made between April 7, 2020 and June 12, 2020.

Specifically excluded from the Settlement Class are: (i) Claire's and its officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (iii) the Judge assigned to evaluate the fairness of this settlement; (iv) the attorneys representing the Parties in the Litigation; (v) banks and other entities that issued payment cards which were utilized at Claire's during the Data Incident; and (vi) 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 Data Incident or who pleads *nolo contendere* (a no-contest plea, while not technically a guilty plea, has the same immediate effect as a guilty plea and is often offered as part of a plea bargain) to any such charge.

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, you may call 1-866-742-4955 with questions or visit www.cyberattacklitsettlement.com. You may also write with questions to Claire's Settlement, c/o Claims Administrator, PO Box 59479, Philadelphia, PA 19102-9479. Please do not contact the Court with questions.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

The Settlement provides for one year of complimentary identity protection services. Every Class member will receive, in the Class notice, a link and a redeemable code to directly obtain a complimentary one-year membership of Experian's® IdentityWorksSM in accordance with Experian's® capabilities in the ordinary course. Class Members' enrollment in this one-year membership is available after the Effective Date of the settlement, and is not dependent on submission of a Claim Form for the other available Settlement relief.

The Settlement will also provide payments to people who submit valid claims.

There are two types of payments that are available:

- (1) Expense Reimbursement (Question 8) and

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

(2) Extraordinary Expense Reimbursement (Question 9).

You may submit a claim for either or both types of payments. You must also provide proof of your class membership in the form of either: (1) the unique identifier provided in the notice you received by postcard or email; or (2) the last four digits of the number associated with the credit or debit card you claim to have used in connection with your online purchase with Claire's during the Data Incident; or (3) a document or documents reflecting your use of a payment card in connection with a Claire's online purchase during the Data Incident, which could include, for example, a receipt from Claire's reflecting payment by a payment card, a payment card statement or bill, or notification from a bank or financial institution stating that the payment card was compromised during the Data Incident. In order to claim each type of payment, you must provide related documentation with the Claim Form.

Total reimbursement under this Settlement is subject to an aggregate cap of \$350,000 for all claims.

As part of the Settlement, Claire's has also committed to establish and maintain security enhancements.

8. What payments are available for Expense Reimbursement?

Class Members are eligible to receive reimbursement of up to \$250 (in total) for out-of-pocket expenses resulting from the Data Incident such as:

- card replacement fees;
- late fees;
- overlimit or overdraft fees;
- interest;
- other bank or credit card fees;
- postage;
- mileage;
- incidental expenses resulting from lack of access to a payment card or account;
- up to \$50 in costs associated with obtaining credit monitoring and identity theft protection (if purchased between March 7, 2020 and [Claims Deadline], with reasonable documentation and an affirmative statement that it was purchased primarily because of the Data Incident, and with proof of purchase);
- reimbursement of up to three (3) hours of documented lost time (at \$19 per hour) spent dealing with replacement card issues or in reversing fraudulent charges (only if at least one full hour was spent and if it can be documented with reasonable specificity); and
- an additional \$19 payment for each credit or debit card on which documented fraudulent charges were incurred that were later reimbursed.

9. What payments are available for Extraordinary Expense Reimbursement?

Class Members who had other extraordinary unreimbursed monetary losses because of payment card information compromised as part of the Data Incident are eligible to make a claim for reimbursement of up to \$3,000. As part of the claim, the Class Member must show that:

- (1) it is an actual, documented, and unreimbursed monetary loss;

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

- (2) the loss was more likely than not caused by the Data Incident;
- (3) the loss occurred during the time period from April 7, 2020 through and including the end of the Claims Deadline;
- (4) the loss is not already covered by one or more of the categories in Question 8; and
- (5) a reasonable effort was made to avoid or seek reimbursement for the loss (including exhaustion of all available credit monitoring insurance and identity theft insurance).

More details are provided in the Settlement Agreement, which is available at www.cyberattacklitsettlement.com.

HOW TO GET BENEFITS

10. How do I get benefits?

To make a claim under the Settlement, you must complete and submit a Claim Form. Claim Forms are available at www.cyberattacklitsettlement.com, or you may request one by mail by calling 1-866-742-4955. Read the instructions carefully, fill out the Claim Form, and submit it online or mail it to:

Claire's Settlement
c/o Claims Administrator
PO Box 59479
Philadelphia, PA 19102-9479

Claim forms must be submitted online by, or postmarked no later than, September 24, 2022.

You must use the Login and Password, provided on the Notice that was mailed to you, to access the online Claim Form.

To receive the one year of complimentary identity protection services, select the "Sign Up To Receive Reminder Email" section on the website. Use the Login and Password provided in the Notice that was mailed to you to access the page.

11. 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 require additional information from any claimant. If the required information is not provided timely, the claim will be considered invalid and will not be paid.

If the claim is complete and the Claims Administrator denies the claim entirely or partially, the claimant will be provided an opportunity to have their claim reviewed by an impartial Claim Referee who has been appointed by the Court.

REMAINING IN THE SETTLEMENT

12. 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 submitted online or postmarked by September 24, 2022.

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

13. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue Claire’s for the claims being resolved by this Settlement, which include claims related to the Data Incident. The specific claims you are giving up against Claire’s are described in Section 1.19 of the Settlement Agreement. You will be “releasing” Claire’s and all related people or entities as described in Section 6 of the Settlement Agreement. The Settlement Agreement is available at www.cyberattacklitsettlement.com.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the law firms listed in Question 17 for free or you can, of course, talk to your own lawyer at your own expense if you have questions about what this means.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, but you want to keep the right to sue Claire’s about issues related to the Data Incident, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or is sometimes referred to as “opting out” of – the Settlement Class.

14. 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, but you will not be bound by any judgment in this case.

15. If I do not exclude myself, can I sue Claire’s for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Claire’s 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 to ask for a payment.

16. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded from the Settlement in *Rossi et. al. v. Claire’s, Inc. et. al.*, Case No. 1:20-cv-05090. Include your name, address, and signature. You must mail your Exclusion Request, postmarked by August 25, 2022, to:

Claire’s Settlement Exclusions
c/o Claims Administrator
PO Box 59479
Philadelphia, PA 19102-9479

THE LAWYERS REPRESENTING YOU

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

17. Do I have a lawyer in this case?

Yes. The Court appointed the following lawyers as “Class Counsel”: Bradley K. King, Adhoot & Wolfson, PC; and M. Anderson Berry, Clayeo C. Arnold, A Professional Law Corp. 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.

18. How will the lawyers be paid?

Class Counsel will request the Court’s approval of an award for attorneys’ fees and reasonable costs and expenses of \$165,000. Class Counsel will also request approval of a service award of \$1,500 for each of the Representative Plaintiffs. Any amount that the Court awards for attorneys’ fees, costs, expenses, and a service award will be paid separately by Claire’s and will not reduce the amount of payments to Class Members who submit valid claims.

OBJECTING TO THE SETTLEMENT

If you do not ask to be excluded from the Settlement, you can tell the Court that you do not agree with the Settlement or some part of it.

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

You can object to the Settlement if you do not like it or some part of it. The Court will consider your views. To do so, you must file a written objection in this case, *Rossi et. al. v. Claire’s, Inc. et. al.*, Case No. 1:20-cv-05090, with the Clerk of the Court at the address below.

Your objection must include all of the following:

- your full name, address, telephone number, and e-mail address (if any);
- information identifying you as a Settlement Class Member, including proof that you are a member of the Settlement Class, which is described in response to question number 7;
- a written statement of all grounds for the objection, accompanied by any legal support for the objection that you believe is applicable;
- the identity of all counsel representing you, if any, in connection with your objection;
- the identity of all counsel representing you who will appear at the Final Approval Hearing;
- a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection;
- a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing;
- your signature and the signature of your duly authorized attorney or other duly authorized representative (along with documentation setting forth such representation);
- a list, by case name, court, and docket number, of all other cases in which you (directly or through counsel) have filed an objection to any proposed class action settlement within the last 3 years;

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

- a list, by case name, court, and docket number, of all other cases in which your counsel (on behalf of any person or entity) has filed an objection to any proposed class action settlement within the last 3 years; and
- a list, by case name, court, and docket number, of all other cases in which you have been a named plaintiff in any class action or served as a lead plaintiff or representative plaintiff.

To be timely, your objection must be **postmarked** to the Clerk of the Court for the United States District Court for the Northern District of Illinois (Eastern Division) no later than August 25, 2022.

In addition, you must **mail** a copy of your objection to both Class Counsel and Defense Counsel, postmarked no later than August 25, 2022:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Office of the Clerk U.S. District Court for the Northern District of Illinois (Eastern Division) Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, IL 60604	Bradley K. King, Ahdoot & Wolfson, PC M. Anderson Berry, Clayeo C. Arnold, P.C. c/o Claire’s Claims Administrator PO Box 59479 Philadelphia, PA 19102-9479	Gilbert S. Keteltas Carey S. Busen Baker & Hostetler LLP c/o Claire’s Claims Administrator PO Box 59479 Philadelphia, PA 19102-9479

20. 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 it should be approved. You can object only if you do not exclude yourself from the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT’S FINAL SETTLEMENT APPROVAL HEARING

The Court will hold a hearing to decide whether to grant final approval of the Settlement.

21. 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 September 27, 2022, at the U.S. District Court for the Northern District of Illinois (Eastern Division), Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.cyberattacklitsettlement.com or call 1-866-742-4955. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys’ fees and reasonable costs and expenses, as well as the request for a service award for the Representative Plaintiffs. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

22. Do I have to attend the hearing?

Questions? Call 1-866-742-4955 or visit www.cyberattacklitsettlement.com

No. Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your 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 mailed it according to the instructions provided in Question 19, the Court will consider it.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Settlement Approval. To do so, you must file an objection according to the instructions in Question 19. Your Objection must be **filed** with the Clerk of the Court for the United States District Court for the Northern District of Illinois (Eastern Division) no later than August 25, 2022. In addition, you must **mail** a copy of your objection to both Class Counsel and Defense Counsel listed in Question 19, postmarked no later than August 25, 2022.

IF YOU DO NOTHING

24. What happens if I do nothing?

If you do nothing, you will get no benefits from this Settlement. Unless you exclude yourself, after the Settlement is granted 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 Claire's about the legal issues in this case, ever again.

GETTING MORE INFORMATION

25. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in a Settlement Agreement. You can get a copy of the Settlement Agreement at www.cyberattacklitsettlement.com. You may also write with questions to Claire's Settlement, c/o Claims Administrator, PO Box 59479, Philadelphia, PA 19102-9479. You can also get a Claim Form at the website, or by calling the toll-free number, 1-866-742-4955.

Exhibit C

CLAIRE'S SETTLEMENT CLAIM FORM

This Claim Form should be filled out online or submitted by mail if you used a payment card to make an online purchase with Claire's Stores, Inc. ("Claire's") during the time period between April 7, 2020 through June 12, 2020, and you had out-of-pocket expenses, fraudulent charges, late fees, overlimit fees, interest, other bank and credit card fees, lost time spent dealing with fraudulent charges or card replacement issues, or unreimbursed extraordinary monetary losses as a result of the Claire's Data Incident. You may get a check if you fill out this Claim Form, if the Settlement is approved, and if you are found to be eligible for a payment.

The Settlement Notice describes your legal rights and options. To obtain the Settlement Notice and find more information regarding your legal rights and options, please visit the official Settlement website, www.cyberattacklitsettlement.com, or call toll-free 1-866-742-4955.

If you wish to submit a claim for a settlement payment electronically, you may go online to the Settlement Website, www.cyberattacklitsettlement.com, and follow the instructions on the "Submit a Claim" page.

If you wish to submit a claim for a settlement payment via standard mail, you must provide the information requested below and mail this Claim Form to Claire's Settlement, c/o Claims Administrator, PO Box 59479, Philadelphia, PA 19102-9479, postmarked by September 24, 2022. Please print clearly in blue or black ink.

1. CLASS MEMBER INFORMATION

Required Information:

First: _____ M: _____ Last: _____

Address 1: _____

Address 2: _____

City: _____ State: _____ ZIP: _____

Country: _____

Phone: _____

Optional Information:

Email: _____

2. PAYMENT ELIGIBILITY INFORMATION

To prepare for this section of the Claim Form, please review the Settlement Notice and Sections 2.1 through 2.3 of the Settlement Agreement (available for download at www.settlementURL.com) for more information on who is eligible for a payment and the nature of the expenses or losses that can be claimed.

To help us determine if you are entitled to a settlement payment, please provide as much information as possible.

A. Verification of Class Membership

You are only eligible to file a claim if you used a credit or debit card in connection with an online purchase with Claire's during the time of the Claire's Data Incident, i.e. between April 7, 2020 through June 12, 2020.

By submitting a claim and signing the certification below, you are verifying that you used a credit or debit card in connection with an online purchase with Claire's during the time of the Claire's Data Incident.

In addition, to allow the Settlement Administrator to confirm your membership in the Class, you must provide either:

(1) The unique identifier provided in the notice you received by postcard or email;

or

(2) the last four digits of the number associated with the credit or debit card you claim to have used in connection with your online Claire's purchase between April 7, 2020 through June 12, 2020,

or

(3) a document or documents reflecting your use of a payment card in connection with your online Claire's purchase during the Data Incident, which could include, for example, a receipt from Claire's reflecting payment by a payment card, a payment card statement or bill, notification from a bank or financial institution stating that the payment card was compromised between April 7, 2020 through June 12, 2020.

Thus, please **EITHER**:

(1) Provide the unique identifier provided in the notice you received: _____.

OR

(2) In the boxes provided below, please provide the last four digits of the card number for each credit or debit card that you used in connection with your online Claire's purchase between April 7, 2020 through June 12, 2020. For each credit or debit card number, provide the date(s) of the transaction(s).

LAST FOUR DIGITS OF CARD	DATE OF TRANSACTION

OR

- (3) **Attach and identify the documentation** that reflects your use of a payment card in connection with your online Claire’s purchase during the Data Incident. Please note that the documentation must reflect the use of a payment card and the date of the transaction.

B. Out-Of-Pocket Expenses

Check the box for each category of out-of-pocket expenses, fraudulent charges, or lost time that you incurred as a result of the Claire’s Data Incident. Please be sure to fill in the total amount you are claiming for each category and **attach the required documentation** as described in **bold type** (if you are asked to provide account statements as part of required proof for any part of your claim, you may redact unrelated transactions and all but the last four digits of any account number, if you wish). Please round total amounts to the nearest dollar.

I. Ordinary Expenses Resulting from the Claire’s Data Incident

- Fees or other charges from your bank or credit card company due to fraudulent activity on your card incurred between April 7, 2020 and September 24, 2022 due to the Claire’s Data Incident.

DATE	DESCRIPTION	AMOUNT

Examples: Overdraft fees, over-the-limit fees, late fees, or charges due to insufficient funds or interest.

Required: A copy of a bank of credit card statement or other proof of claimed fees or charges (you may redact unrelated transactions and all but the last four digits of any account number).

- Fees or other charges relating to the reissuance of your credit or debit card incurred between April 7, 2020 and September 24, 2022 due to the Claire’s Data Incident.

DATE	DESCRIPTION	AMOUNT

Examples: Fees that your bank charged you because you requested a new credit or debit card.

Required: Attach a copy of a bank or credit card statement or other receipt showing these fees (you may redact unrelated transactions and all but the last four digits of any account number).

- Fees relating to your account being frozen or unavailable incurred between April 7, 2020 and September 24, 2022 due to the Claire’s Data Incident.

DATE	DESCRIPTION	AMOUNT

Examples: You were charged interest by a payday lender due to card cancellation or due to an over-limit situation. You had to pay a fee for a money order or other form of alternative payment because you could not use your debit or credit card.

Required: Attach a copy of receipts, bank statements, credit card statements, or other proof that you had to pay these fees (you may redact unrelated transactions).

- Other incidental telephone, internet, or postage expenses directly related to the Claire’s Data Incident incurred between April 7, 2020 and September 24, 2022 due to the Claire’s Data Incident.

DATE	DESCRIPTION	AMOUNT

Examples: Long distance phone charges, cell phone charges (only if charged by the minute), or data charges (only if charged based on the amount of data used).

Required: Attach a copy of the bill from your telephone company, mobile phone company, or internet service provider that shows the charges (you may redact unrelated transactions).

- Credit Reports or credit monitoring charges purchased between April 7, 2020 and [the Claims Deadline] due to the Claire’s Data Incident. This category is limited to a maximum of \$50 in costs associated with credit monitoring or identity theft insurance, if purchased primarily as a result of the Data Incident and if purchased between April 7, 2020 and September 24, 2022.

To obtain reimbursement under this category, you must attest to the following:

- I purchased credit reports between April 7, 2020 and September 24, 2022, primarily due to the Data Incident and not for other purposes.

DATE	COST

Examples: The cost of a credit report(s) that you purchased after hearing about the Data Incident.

Required: Attach a copy of a receipt or other proof of purchase for each product purchased (you may redact unrelated transactions).

Between one (1) and three (3) hours of documented time spent dealing with replacement card issues or in reversing fraudulent charges between April 7, 2020 and [the Claims Deadline] that occurred as a result of the Claire’s Data Incident (round to the nearest hour and check only one box).

- 1 Hour 2 Hours 3 Hours

Examples: You spent at least one (1) full hour calling customer service lines, writing letters or emails, or on the internet in order to get fraudulent charges reversed or in updating automatic payment programs because your card number changed. Please note that the time that it takes to fill out this Claim Form is not reimbursable and should not be included in the total number of hours claimed.

Required: If time was spent on the telephone or online, in the space below, describe what you did, or attach a copy of any letters or emails that you wrote. Examples: If the time was spent trying to reverse fraudulent charges, describe what you did. If the time was spent updating accounts due to your card being reissued, identify the other accounts that had to be updated.

II. Reimbursed Fraudulent Charges

Did you also have fraudulent charges to a credit or debit card account that were reversed or repaid as a result of the Data Incident? If so, in addition to your out-of-pocket expenses, you are eligible to claim a \$19 cash payment for each debit or credit card on which fraudulent charges were made and reversed or repaid, to compensate for lost time associated with seeking reimbursement for the fraud. (See Section 2.1 of the Settlement Agreement.)

LAST FOUR DIGITS OF CARD	DATE CHARGES REVERSED (ONLY 1 PER CARD REQUIRED)

Required: For each card, provide a card statement or other documentation showing (1) one or more fraudulent charges were posted to your account that you believe were caused by the Claire’s Data Incident, and (2) the charges were later reversed or reimbursed by the bank or credit card company (you may redact unrelated transactions and all but the last four digits of any account number).

III. Extraordinary Expenses

If you have expenses related to the Data Incident that are different than the type of ordinary expenses covered in the categories in Sections I and II above, you may be entitled to compensation for your extraordinary expenses. To obtain reimbursement under this category, you must attest to the following:

- I incurred out-of-pocket unreimbursed expenses that occurred more likely than not as a result of the Claire’s Data Incident during the time period from April 7, 2020 through [the Claims Deadline] other than those expenses covered by one or more of the categories above, and I made reasonable efforts to avoid, or seek reimbursement for the loss, including exhausting all available credit monitoring insurance and identity theft insurance.

- Unreimbursed fraudulent charges incurred between April 7, 2020 and September 24, 2022 due to the Claire’s Data Incident.

DATE	DESCRIPTION	AMOUNT

Examples: Fraudulent charges that were made on your credit or debit card account and that were not reversed or repaid even though you reported them to your bank or credit card company. *Note: most banks are required to reimburse customer in full for fraudulent charges on payment cards that they issue.*

Required: The bank statement or other documentation reflecting the fraudulent charges, as well as documentation reflecting the fact that the charge was fraudulent (you may redact unrelated transactions and all but the last four digits of any account number). If you do not have anything in writing reflecting the fact that the charge was fraudulent (e.g., communications with your bank or a police report), please identify the approximate date that you reported the fraudulent charge, to whom you reported it, and the response.

Date reported:

Description of the person(s) to whom you reported the fraud:

- Other unreimbursed out-of-pocket expenses that were incurred between April 7, 2020 and September 24, 2022 as a result of the Claire’s Data Incident that are not accounted for in your response above.

DATE	DESCRIPTION	AMOUNT

Examples: This category includes any other unreimbursed expenses or charges that are not otherwise accounted for in your answers to the questions above, including any expenses or charges that you believe were the result of an act of identity theft.

Required: Describe the expense, why you believe that it is related to the Claire's Data Incident, and provide as much detail as possible about the date you incurred the expense(s) and the company or person to whom you had to pay it. Please provide copies of any receipts, police reports, or other documentation supporting your claim. For claims of reimbursement for lost time, you must provide actual documentation reflecting the amount of time you spent dealing with replacement card issues or in reversing fraudulent charges sufficient to prove how much time was spent, on what, and that the time was spent on issues related to the Claire's Data Incident. The Settlement Administrator may contact you for additional information before processing your claim.

C. Certification

I declare under penalty of perjury under the laws of the United States that the information supplied in this Claim Form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that I may be asked to provide supplemental information by the Settlement Administrator or Claims Referee before my claim will be considered complete and valid.

Print Name: _____

Signature: _____

Date: _____

D. Submission Instructions

Once you've completed all applicable sections, please mail this Claim Form and all required supporting documentation to the address provided below, postmarked by September 24, 2022.

Rossi, et al. v. Claire's Stores Inc., et al.
Claims Administrator
PO Box 59479
Philadelphia, PA 19102-9479

Exhibit D

Claire's Stores Exclusions	
First Name	Last Name
Ngozy	Vancooten