UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re Shields Health Care Group, Inc. Data Breach Litigation	Case No.: 1:22-cv-10901-PBS Hon. Patti B. Saris

[PROPOSED] ORDER REGARDING DISTRIBUTION OF REMAINDER FUNDS

WHEREAS, a Settlement Agreement, dated as of May 15, 2025 (the "Settlement Agreement"), was made and entered into by and among the following Parties: Plaintiffs Constantine Kossifos, William Biscan, Tennie Komar, Lisa Smith, Amanda Johnson, Christine Cambria, Courtney Horgan, Kenneth Vandam, Peter Shea, and Maria Melo, individually and on behalf of the State Action Settlement Class Members, by and through George Feldman McDonald, PLLC; Lynch Carpenter LLP; Keller Postman, LLC; Morgan & Morgan; Mazow McCullough, PC; and (ii) Shields Health Care Group, Inc., by and through its counsel Mullen Coughlin, LLC.

WHEREAS, the Court entered a Final Approval Order and Judgment of the Settlement ("Final Approval Order") on December 18, 2025 (Doc. 179), which did not include an order regarding disposition of any remainder funds from the Settlement.

WHEREAS, having reviewed Defendant's Request for Distribution of Remainder Funds, filed on January 28, 2025.

IT IS HEREBY ORDERED THAT:

Recognizing that of the approximate 2,382,578 individuals comprising the Federal Action and State Action Settlement Classes, as referenced in the Settlement Agreement and Final Approval Order, approximately 249,886 (10.5%) are non-Massachusetts residents and members of the Federal Action Settlement Class, to the extent any remainder funds exist following distribution of the Settlement Fund, 10.5% shall be paid by the Settlement Administrator to the

Consumer Federation of America, which is determined to be an appropriate *cy pres* recipient. The

outstanding 89.5% of any remainder funds shall be distributed to a recipient determined by the

Massachusetts Superior Court, Norfolk County, which has jurisdiction over the State Action

Settlement Class.

ENTERED: _____, 2026

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Hon. Patti B. Saris
UNITED STATES DISTRICT JUDGE