

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE SHIELDS HEALTH GROUP, INC  
DATA BREACH LITIGATION

CASE NO. 1:22-cv-10901-PBS

Hon. Patti B. Saris

**COMMONWEALTH OF MASSACHUSETTS**

**NORFOLK, ss.**

**CONSTANTINE KOSSIFOS**, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,  
INC.,**

Defendant.

**SUPERIOR COURT  
TRIAL COURT DEPARTMENT**

**CASE NO. 2282-cv-00561**

**CONSOLIDATED WITH:**

**ESSEX, ss.**

**AMANDA JOHNSON, CHRISTINE  
CAMBRIA, COURTNEY HORGAN, and  
KENNETH VANDAM**, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,  
INC.,**

Defendant.

**SUPERIOR COURT  
TRIAL COURT DEPARTMENT**

**CASE NO. 2277-cv-00839**

**NORFOLK, ss.**

**WILLIAM BISCAN, TENNIE KOMAR,  
and LISA SMITH**, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

**SHIELDS HEALTH CARE GROUP,  
INC.,**

Defendant.

**SUPERIOR COURT  
TRIAL COURT DEPARTMENT**

**CASE NO. 2382-cv-0023**

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**SUPPLEMENTAL NOTICE CONCERNING DEFENDANT’S AMENDED PROPOSED  
ORDER FOR THE DISTRIBUTION OF RESIDUAL FUNDS**

Following the hearing held in connection with the Joint Motions for Final Approval on December 16, 2025, Plaintiffs’ counsel met and conferred extensively with counsel for Defendant. Plaintiffs take no position on Defendant’s Amended Proposed Order for the Distribution of Residual Funds.

The Settlement Agreement, in relevant part, designates the Massachusetts Local Consumer Aid Fund as the *cy pres* recipient of any residual funds and provides “[i]f the Courts do not approve the Massachusetts Local Consumer Aid Fund, Defendant shall select the alternative charitable organization or organizations to be recipient(s) of any *cy pres* distribution” and only thereafter may Plaintiffs consider such alternative proposed recipient for approval. ECF No. 175-1 at 2.41.

Any additional litigation concerning the *cy pres* recipient(s) should take place without prejudice to Settlement Class Members.

Dated: January 28, 2026

*/s/ Brendan Jarboe*

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