

**STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 18th JUDICIAL CIRCUIT
COUNT OF DUPAGE**

STEPHANIE HOOVER, RONALD
BAILEY, DENA KIGER, JOSE KIGER,
and JAMES HALL, *individually and on
behalf of all others similarly situated,*

Plaintiffs,

v.

CAMPING WORLD GROUP, LLC,
GOOD SAM ENTERPRISES, LLC,
CWI, INC., and CAMPING WORLD
HOLDINGS, INC.

Defendants.

Civil Action No. 2023LA000372

**DECLARATION OF CAMERON R. AZARI, ESQ. ON IMPLEMENTATION OF
NOTICE PLAN AND NOTICES**

I, Cameron R. Azari, Esq., declare as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am a nationally recognized expert in the field of legal notice, and I have served as an expert in hundreds of federal and state cases involving class action notice plans.
3. I am a Senior Vice President with Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Director of Legal Notice for Hilsoft Notifications (“Hilsoft”); a firm that specializes in designing, developing, analyzing and implementing large-scale legal notification plans. Hilsoft is a business unit of Epiq.
4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business.

OVERVIEW

5. This declaration describes the implementation of the Notice Plan (“Notice Plan”) and Notices (“Notice” or “Notices”) for *Hoover et al. v. Camping World Group, LLC, et al.*, No. 2023LA000372, in the Circuit Court of the 18th Judicial Circuit, DuPage County, Illinois. I previously executed my *Declaration of Cameron R. Azari, Esq. On Notice Plan and Notices*, on September 20, 2023, which described the Notice Plan, detailed Hilsoft’s class action notice experience, and attached Hilsoft’s *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice programs.

NOTICE PLAN SUMMARY

6. Illinois Code of Civil Procedure Sec. 2-803 states, “Upon a determination that an action may be maintained as a class action, or at any time during the conduct of the action, the court in its discretion may order such notice that it deems necessary to protect the interests of the class and the parties.”¹ The proposed Notice Plan satisfied this requirement.

7. The Notice Plan was designed to reach the greatest practicable number of identified Settlement Class Members sent individual notice. The Notice Plan individual notice efforts reached approximately 96.8% of the identified Settlement Class Members who were sent notice. The reach was further enhanced by a Settlement Website. In my experience, the reach of the Notice Plan was consistent with other court-approved notice plans, was the best notice practicable under the circumstances of this case and satisfied the requirements of due process, including its “desire to actually inform” requirement.²

¹ 735 ILCS 5/2-803.

² *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”); *see also In re Hyundai & Kia Fuel Econ. Litig.*, 926 F.3d 539, 567 (9th Cir. 2019) (“To satisfy Rule 23(e)(1), settlement notices must ‘present information about a proposed settlement neutrally, simply, and understandably.’ ‘Notice is

NOTICE PLAN DETAIL

8. On December 12, 2023, the Court approved the Notice Plan and appointed Epiq as the Settlement Administrator in the *Order Granting Third Amended Unopposed Motion for Preliminary Approval of Class Settlement Agreement* (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court approved the following “Settlement Class”:

Individuals identified on the Settlement Class List, including all individuals who were notified by Defendants that their personal information was or may have been compromised in the Data Security Incident.

Excluded from the Settlement Class are: (1) the judges presiding over this Litigation, and members of their direct families; (2) the Defendants, their subsidiaries, parent companies, successors, predecessors, and any entity in which any Defendant or any of its parents has a controlling interest and their current or former officers, directors, and employees; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

9. After the Court’s Preliminary Approval Order was entered, Epiq began to implement the Notice Plan. This declaration details the notice activities undertaken to date and explains how and why the Notice Plan was comprehensive and well-suited to reach the Settlement Class Members. This declaration also discusses the administration activity to date.

NOTICE PLAN

Individual Notice

10. On December 18, 2023, Epiq received one data file with 30,182 unique, identified Settlement Class Member records, which included names and current or last known addresses. Epiq deduplicated and rolled-up the records and loaded the unique, identified Settlement Class Member records into its database. These efforts resulted in 28,278 unique, identified Settlement Class Member records, which were sent a Postcard Notice via United States Postal Service (“USPS”) first-class mail.

satisfactory if it generally describes the terms of the settlement in sufficient detail to alert those with adverse viewpoints to investigate and to come forward and be heard.’”) (citations omitted); N.D. Cal. Procedural Guidance for Class Action Settlements, Preliminary Approval (3) (articulating best practices and procedures for class notice).

Individual Notice – Direct Mail

11. On January 9, 2024, Epiq sent 28,278 Postcard Notices to identified Settlement Class Members for whom an associated physical mailing address was available. The Postcard Notices were sent via USPS first-class mail. The Postcard Notices clearly and concisely summarized the case, the Settlement, and the legal rights of the Settlement Class Members and directed Settlement Class Members to the Settlement Website for additional information.

12. Prior to sending the Postcard Notice, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the USPS to ensure Settlement Class Member address information was up-to-date and accurately formatted for mailing.³ In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

13. The return address on the Postcard Notices is a post office box that Epiq maintains for this case. The USPS automatically forwarded Postcard Notices with an available forwarding address order that has not expired (“Postal Forwards”). Postcard Notices returned as undeliverable were re-mailed to any new address available through USPS information, (for example, to the address provided by the USPS on returned mail pieces for which the automatic forwarding order has expired, but is still within the time period in which the USPS returns the piece with the address indicated), or to better addresses that were found using a third-party lookup service. Upon successfully locating better addresses, Postcard Notices were promptly re-mailed. As of February 12, 2024, Epiq has re-mailed 119 Postcard Notices. The Postcard Notice is included as **Attachment 1**. The Long Form Notice is included as **Attachment 2**.

³ The NCOA database is maintained by the USPS and consists of approximately 160 million permanent change-of-address (COA) records consisting of names and addresses of individuals, families, and businesses who have filed a change-of-address with the Postal Service™. The address information is maintained on the database for 48 months and reduces undeliverable mail by providing the most current address information, including standardized and delivery-point-coded addresses, for matches made to the NCOA file for individual, family, and business moves.

Notice Results

14. As of February 12, 2024, a Postcard Notice was delivered to 27,393 of the 28,278 unique, identified Settlement Class Members who were sent notice. This means the individual notice efforts reached approximately 96.8% of the identified Settlement Class Members who were sent notice.

Settlement Website

15. On January 8, 2024, Epiq established a neutral, informational Settlement Website with an easy to remember domain name (www.CWGSDataSettlement.com). The Settlement Website allows Settlement Class Members to obtain detailed information about the case and review relevant documents, including the Notice, Settlement Agreement, Plaintiffs' motion for preliminary approval of the Settlement, the Preliminary Approval Order, Plaintiffs' Fee Application, and the Complaint. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions ("FAQs"), instructions for how Settlement Class Members are able to opt-out (request exclusion) from or object to the Settlement, contact information for the Settlement Administrator, and how to obtain other case-related information. The Settlement Website address was prominently displayed in all notice documents. As of February 12, 2024, there have been 574 unique visitor sessions to the Settlement Website, and 765 web pages have been presented.

Toll-free Telephone Number and Postal Mailing Address

16. On January 8, 2024, Epiq established a toll-free telephone number (1-888-522-6906) to allow Settlement Class Members to call for additional information and listen to answers to FAQs. This automated phone system is available 24 hours per day, 7 days per week. In addition, callers have the option to speak with a live agent during normal business hours. The toll-free telephone number was prominently displayed in all notice documents. As of February 12, 2024, the toll-free number has handled 152 calls to the toll-free telephone number representing 438 minutes of use, and service agents have handled 20 incoming calls representing 227 minutes of use.

17. A postal mailing address was established and continues to be available to allow Settlement Class Members to contact the Settlement Administrator to request additional information or ask questions.

Requests for Exclusion and Objections

18. The Deadline to request exclusion (opt-out) from the Settlement or to object to the Settlement is February 23, 2024. As of February 12, 2024, Epiq has received no requests for exclusion. As of February 12, 2024, I am aware of no objections to the Settlement.

PLAIN LANGUAGE NOTICE DESIGN

19. The Class Notices were carefully designed in consultation with counsel for the settling parties, to be “noticed,” reviewed, and—by presenting the information in plain language—understood by Settlement Class Members. The design of the Notices followed principles embodied in the Federal Judicial Center’s (“FJC”) illustrative “model” notices, posted at www.fjc.gov. Many courts, and the FJC itself, have approved notices that Epiq has written and designed in a similar fashion. The Notices contained substantial, easy-to-read summaries of all key information about rights and options available to the Settlement Class Members. Consistent with our standard practice, all notice documents underwent a final edit for grammar and accuracy prior to their dissemination.

20. The Long Form Notice provided substantial information to the Settlement Class Members. The Long Form Notice included (i) details regarding the ability to opt-out or object to the Settlement Agreement, (ii) the deadline to opt-out, or object to the Settlement, and (iii) the date, time, and location of the Final Approval Hearing, among other information.

COST OF NOTICE AND SETTLEMENT ADMINISTRATION

21. Epiq is aware of, and will adhere to, the \$100,000 cap on the cost to provide notice and settlement administration services, as approved by the Court in the Preliminary Approval Order. As of February 12, 2024, Epiq has invoiced \$48,630.17 to implement the Notice Plan and provide settlement administration services. Epiq will incur additional costs following the Final Approval Hearing to complete the settlement administration for this case. The remaining work to be completed is a significant piece of Epiq’s estimate, including: 1) calculating distribution payments to Settlement Class Members; 2) distributing settlement funds to Settlement Class Members (physical checks and postage); 3) handling undeliverable payments; 4) re-issuing payments; 5) communications with

Settlement Class Members, including maintaining the Settlement Website and toll-free telephone number throughout the remaining duration of the settlement administration; 6) Qualified Settlement Fund (“QSF”) management, tax reporting, and sales tax; and 7) associated project management and related billable hours to handle the distribution and related settlement administration responsibilities.

22. The total costs to implement the Notice Plan and provide settlement administration are fair and reasonable under the circumstances of this case. All costs are subject to the Service Contract under which Epiq is retained as Settlement Administrator, and the terms and conditions of that agreement.

CONCLUSION

23. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by state and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice plan be designed to reach the greatest practicable number of potential class members and, in a settlement class action notice situation such as this, that the notice or notice plan itself not limit knowledge of the availability of benefits—nor the ability to exercise other options—to class members in any way. All of these requirements were met in this case.

24. The Notice Plan included an extensive individual notice effort to the identified Settlement Class Members. With the address updating protocols that were used, the Notice Plan individual notice efforts reached approximately 96.8% of the identified Settlement Class Members who were sent notice. The reach was further enhanced by the Settlement Website. The Federal Judicial Center’s (“FJC”) Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide states that “the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the Settlement Class. It is reasonable to reach between 70–95%.”⁴ Here, the Notice Plan achieved a reach toward


⁴ FED. JUDICIAL CTR., JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN LANGUAGE GUIDE 3 (2010), available at [http://www.fjc.gov/public/pdf.nsf/lookup/NotCheck.pdf/\\$file/NotCheck.pdf](http://www.fjc.gov/public/pdf.nsf/lookup/NotCheck.pdf/$file/NotCheck.pdf).

the high end of that standard.

25. The Notice Plan provided the best notice practicable under the circumstances of this case, conformed to all aspects of Illinois Code of Civil Procedure Sec. 2-803, comported with the guidance for effective notice articulated in the Manual for Complex Litigation 4th Ed and FJC guidance, and met the requirements of due process, including its “desire to actually inform” requirement.

26. The Notice Plan schedule afforded enough time to provide full and proper notice to the Settlement Class Members before any opt-out deadline.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 13, 2024.



Cameron R. Azari, Esq.

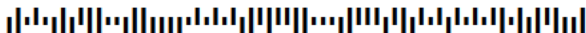
Attachment 1

Camping World
Settlement Administrator
PO Box 6749
Portland, OR 97228-6749

PRESORTED
FIRST-CLASS MAIL
AUTO
U.S. POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2882

Court-Approved Legal Notice

If you were notified that your personal information was or may have been compromised in a Data Security Incident involving Camping World Holdings, Inc. and other companies, you may be entitled to two (2) years of credit monitoring and a cash payment from a class action settlement.



A \$650,000 Settlement has been reached in a class action lawsuit against CWGS Group, LLC, Good Sam Enterprises, LLC, CWI, LLC fka CWI, Inc., and Camping World Holdings, Inc. (collectively, “Defendants”) regarding a data security incident. Plaintiffs allege that a Data Security Incident disclosed by Defendants on or about November 3, 2022, potentially affected certain sensitive, personally identifiable information of people who worked for or purchased goods or services from Defendants, among others (the “Data Security Incident”).

You are Receiving this Notice Because Defendants’ Records Indicate You may be a Settlement Class Member. You are a “Settlement Class Member” if you were notified by Defendants that your personal information was or may have been compromised in the Data Security Incident.

What Does the Settlement Provide? The Settlement provides the following benefits to Settlement Class Members without the need to file a claim:

- Two (2) years of one bureau credit monitoring once the court grants final approval of the Settlement. The telephone number and code to redeem your credit monitoring benefit are below, and the code can be redeemed once the final approval of the settlement is granted.

Toll-Free Number: 800-455-7440

Redemption Code: [REDACTED]

Online: <https://app.identitydefense.com/enrollment/activate/camp>

Redemption Code: [REDACTED]

- A cash Settlement Payment by check in an amount equal to a *pro rata* share (a legal term meaning equal share) of what remains in the Net Settlement Fund after all necessary fees and costs are paid.

Your Options. If you do *not* want a settlement benefit, and you want to keep the right to sue or continue to sue Defendants on your own about the legal issues in this lawsuit, you must file a Request for Exclusion **postmarked by February 23, 2024**. If you do not exclude yourself, you will remain in the Settlement Class and will lose the right to sue Defendants about the legal issues in this lawsuit and will be bound by the Settlement. If you do not exclude yourself, you may object to the Settlement. The deadline to object is **February 23, 2024**.

The Court will hold a Final Approval Hearing on **April 17, 2024, at 9:00 a.m.**, to consider whether to approve the Settlement, attorneys’ fees, costs, and expenses, and Service Award Payments, and hear any objections. You do not need to attend the hearing. If you file an objection that includes a notice of intention to appear, you may attend the hearing, and you may ask to speak, but you do not have to speak. You may hire your own lawyer to attend, at your own expense, but you do not need to do so. You can object either in person or remotely at the Final Approval Hearing, regardless of whether you have submitted a timely written objection. After the hearing, the Court will decide whether to approve the Settlement. This notice summarizes the Settlement and your rights.

More information is available at www.CWGSDataSettlement.com or by calling toll-free 1-888-522-6906

Attachment 2

If you were notified that your personal information was or may have been compromised in a Data Security Incident involving Camping World Holdings, Inc. and other companies, you may be entitled to two (2) years of credit monitoring and a cash payment from a class action settlement.

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

- A \$650,000 Settlement has been reached in a class action lawsuit against CWGS Group, LLC, Good Sam Enterprises, LLC, CWI, LLC fka CWI, Inc., and Camping World Holdings, Inc. (collectively, “Defendants”) regarding a data security incident. Plaintiffs allege that a Data Security Incident disclosed by Defendants on or about November 3, 2022, potentially affected certain sensitive, personally identifiable information of people who worked for or purchased goods or services from Defendants, among others (the “Data Security Incident”).
- You are a “Settlement Class Member” if you were notified by Defendants that your personal information was or may have been compromised in the Data Security Incident.
- The Settlement provides the following settlement benefits to Settlement Class Members.

Credit Monitoring

If you are a Settlement Class Member and do not opt out, you will have the opportunity to accept a credit monitoring benefit of two (2) years of free one bureau credit monitoring.

Cash Settlement Payment

If you are a Settlement Class Member and do not opt out, you will receive a cash Settlement Payment in an amount equal to a *pro rata* share (a legal term meaning equal share) of what remains in the Net Settlement Fund after all necessary fees and costs are paid. The cash Settlement Payment is an automatic payment to be paid by check, you do not need to file a claim to receive a cash Settlement Payment.

Business Practice Changes

Following the Data Security Incident, Defendants engaged leading outside forensics and cybersecurity experts, launched containment and remediation efforts, and a forensic investigation. Defendants have since taken and will continue to take measures to enhance the security and integrity of their IT Systems.

This Notice may affect your rights. Please read it carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
Exclude Yourself	Get no settlement benefits. Keep your right to file your own lawsuit against the Released Persons (including Defendants) about the legal claims in this case.	February 23, 2024
Object	Tell the Court why you do not like the Settlement or the Fee Application. You will still be bound by the Settlement if the Court approves it.	February 23, 2024
Go to a Hearing	If you are a Settlement Class Member, you have the right, but are not required, to attend the Final Approval Hearing.	
Do Nothing	Receive two (2) years of credit monitoring and an automatic cash Settlement Payment by check. Be bound by the Settlement.	

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court must decide whether to approve the Settlement and the requested attorneys’ fees, costs, and expenses. No settlement benefits will be provided unless the Court approves the Settlement.

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	PAGE 3
1. Why is this Notice being provided?	
2. What is this lawsuit about?	
3. Why is the lawsuit a class action?	
4. Why is there a Settlement?	
WHO IS INCLUDED IN THE SETTLEMENT?.....	PAGE 3
5. How do I know if I am part of the Settlement?	
6. Are there exceptions to being included in the Settlement?	
7. What if I am still not sure whether I am part of the Settlement?	
THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY	PAGE 4
8. What does the Settlement provide?	
9. How will the amount of cash Settlement Payments be determined?	
10. What am I giving up to receive settlement benefits or stay in the Settlement Class?	
11. What are the Released Claims?	
HOW TO GET BENEFITS FROM THE SETTLEMENT	PAGE 5
12. Do I have to file a claim to receive settlement benefits?	
13. What happens if my contact information changes?	
14. When will I receive my settlement benefits?	
THE LAWYERS REPRESENTING YOU.....	PAGE 5
15. Do I have a lawyer in this case?	
16. How will Class Counsel be paid?	
OPTING OUT FROM THE SETTLEMENT.....	PAGE 6
17. How do I get out of the Settlement?	
18. If I opt out, can I get anything from the Settlement?	
19. If I do not opt out, can I sue Defendants for the same thing later?	
OBJECTING TO THE SETTLEMENT	PAGE 6
20. How do I tell the Court that I do not like the Settlement?	
21. What is the difference between objecting and asking to opt out?	
THE FINAL APPROVAL HEARING.....	PAGE 7
22. When and where will the Court decide whether to approve the Settlement?	
23. Do I have to attend the Final Approval Hearing?	
24. May I speak at the Final Approval Hearing?	
IF YOU DO NOTHING.....	PAGE 8
25. What happens if I do nothing at all?	
GETTING MORE INFORMATION.....	PAGE 8
26. How do I get more information?	

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

BASIC INFORMATION

1. Why is this Notice being provided?

A court authorized this Notice because you have the right to know about the proposed Settlement of three class action lawsuits and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuits, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get settlement benefits.

This case is pending in DuPage County, Illinois, and is known as *Hoover et al. v. Camping World Group, LLC et al.*, Civil Action No. 2023LA000372. The persons who filed the lawsuits are called the “Plaintiffs” and the companies sued, CWGS Group, LLC, Good Sam Enterprises, LLC, CWI, LLC fka CWI, Inc., and Camping World Holdings, Inc. are collectively called “Defendants.”

2. What is this lawsuit about?

Plaintiffs allege that a Data Security Incident disclosed by Defendants on or about November 3, 2022, potentially affected certain sensitive, personally identifiable information of people who worked for or purchased goods or services from Defendants, among others.

Defendants continue to deny any wrongdoing whatsoever. By entering into the Settlement, Defendants are not admitting any wrongdoing.

3. Why is the lawsuit a class action?

In a class action, plaintiffs sue on behalf of all people who have similar claims. In this lawsuit, Plaintiffs, also referred to as “Settlement Class Representatives,” are James Hall, Ronald Bailey, Dena Kiger, Jose Kiger, and Stephanie Hoover. Together, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those Settlement Class Members who timely exclude themselves (opt out) from the Settlement Class.

4. Why is there a Settlement?

Plaintiffs and Defendants do not agree with the legal allegations asserted in this lawsuit. The Court has not decided in favor of Plaintiffs or Defendants. Instead, Plaintiffs and Defendants have agreed to settle the lawsuit. Plaintiffs and the lawyers for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members because of the benefits of the Settlement and the risks and uncertainty associated with continued litigation.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are a Settlement Class Member if you are an individual that was notified by Defendants your personal information was or may have been compromised in the Data Security Incident (meaning the Data Security Incident initially disclosed by Defendants in or around November 2022).

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are: (1) the judges presiding over this litigation, and members of their direct families; (2) Defendants, their subsidiaries, parent companies, successors, predecessors, and any entity in which any Defendant or any of its parents has a controlling interest and their current or former officers, directors, and employees; and (3) Settlement Class Members who submit a valid Request for Exclusion prior to the Opt-Out Deadline.

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.CWGSDataSettlement.com or call the Settlement Administrator's Settlement Toll-Free Number at 1-888-522-6906.

THE SETTLEMENT BENEFITS - WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

Credit Monitoring

If you are a Settlement Class Member and do not opt out, you will have the opportunity to accept a credit monitoring benefit of two (2) years of free one bureau credit monitoring. You do not need to file a claim to receive credit monitoring. However, the benefit is not available until after the Effective Date of the Settlement. The enrollment period will begin upon the Effective Date, and you will need to call the following toll-free telephone number and provide your unique code found on the postcard provided to you: 800-455-7440, or enroll online at <https://app.identitydefense.com/enrollment/activate/camp>. You can enroll once final approval of the Settlement is granted. Your two years of credit monitoring will begin once you enroll.

Cash Settlement Payment

If you are a Settlement Class Member and do not opt out, you will receive a cash Settlement Payment in an amount equal to a *pro rata* share (a legal term meaning equal share) of what remains in the Net Settlement Fund after all necessary fees and costs are paid.

The cash Settlement Payment is an automatic payment by check, you do not need to file a claim to receive a cash Settlement Payment.

Business Practice Changes

Following the Data Security Incident, Defendants engaged leading outside forensics and cybersecurity experts, launched containment and remediation efforts, and a forensic investigation. Defendants have since taken and will continue to take measures to enhance the security and integrity of their IT Systems.

9. How will the amount of cash Settlement Payments be determined?

According to the Settlement Agreement, a \$650,000 Settlement Fund will be established for the Settlement and will be used to pay for: (1) Notice and Administrative Expenses; (2) Taxes and Tax-Related Expenses; (3) Service Award Payment approved by the Court; (4) attorneys' fees, costs, and expenses; and (5) two (2) years of one bureau credit monitoring. The amount remaining after these items are paid or allocated, if any is the "Net Settlement Fund."

The Net Settlement Fund will be used to provide cash Settlement Payments to Settlement Class Members, which will be determined by dividing the remaining Net Settlement Fund amount by the number of Settlement Class Members (this is called a *pro rata* share – a legal term meaning equal share).

10. What am I giving up to receive settlement benefits or stay in the Settlement Class?

Unless you exclude yourself (opt out), you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other action for all Released Claims, including Unknown Claims, against the Released Persons (including Defendants) that relates to the Data Security Incident or this lawsuit. The specific rights you are giving up are called "Released Claims."

11. What are the Released Claims?

The Settlement Agreement in Sections A(21) and K describes the Releases, Released Claims, and Released Persons in necessary legal terminology, so please read these sections carefully. The Released Claims also includes the release of Unknown Claims, which is also described in necessary legal terminology in the Settlement Agreement in

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

Section K(2). The Settlement Agreement is available at www.CWGSDataSettlement.com or in the public Court records on file in these lawsuits. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact one of the lawyers listed in Question 15 of this Notice for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

12. Do I have to file a claim to receive settlement benefits?

No, cash Settlement Payments will be automatic payments by check, you do not need to file a claim to receive a cash Settlement Payment. In order to receive credit monitoring, no claim is necessary but you must call the credit monitoring service vendor in Question 8 and provide your unique code found on your postcard that was mailed to you, or enroll online at <https://app.identitydefense.com/enrollment/activate/camp>.

13. What happens if my contact information changes?

If you change your mailing address or email address, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by calling 1-888-522-6906 or by writing to:

Camping World Settlement Administrator
PO Box 6749
Portland, OR 97228-6749

14. When will I receive my settlement benefits?

Cash Settlement Payments from the Net Settlement Fund described in Question 9 will be provided to Settlement Class Members by check after the Settlement is approved by the Court and becomes final, and the enrollment period for credit monitoring is closed. It may take time for the Settlement to be approved and become final. Please be patient and check www.CWGSDataSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed attorneys Gary Klinger, Nicholas Migliaccio, Ryan D. Maxey, and Raina Borrelli as Class Counsel to represent you and the Settlement Class for purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this lawsuit.

Class Counsel	
<p>Gary M. Klinger Milberg Coleman Bryson Phillips Grossman LLC 221 W. Monroe Street, Suite 2100 Chicago, IL 60606</p> <p>Ryan D. Maxey Maxey Law Firm, P.A. 107 N. 11th Street, #402 Tampa, Florida 33602 (813) 448-1125 ryan@maxeyfirm.com</p>	<p>Nicholas A. Migliaccio Migliaccio & Rathod LLP 412 H Street N.E., Suite 302 Washington, DC 20002 (202) 470-3520 nmigliaccio@classlawdc.com</p> <p>Raina C. Borrelli Sam Strauss Turke & Strauss LLP 613 Williamson Street, Suite 201 Madison, WI 53703 (608) 237-1775 raina@turkestrauss.com Sam@turkestrauss.com</p>

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys' fees, not to exceed 35% of the Settlement Fund (\$227,500) and for reimbursement of litigation costs and expenses not to exceed \$50,000. Class Counsel will also ask the Court to approve Service Award Payments not to exceed \$2,500 for each of the Settlement Class Representatives in recognition for their contributions to this lawsuit. If awarded by the Court, attorneys' fees, costs, and expenses, and the Service Award Payments will be paid out of the Settlement Fund. The Court may award less than these amounts.

OPTING OUT FROM THE SETTLEMENT

If you are a Settlement Class Member and want to keep any right you may have to sue or continue to sue Defendants or Released Persons on your own based on the claims raised in these lawsuits or released by the Released Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from or "opting out" of the Settlement.

17. How do I get out of the Settlement?

To opt out of the Settlement, you must mail a written Request for Exclusion, which must include all of the following:

- 1) The words "Camping World Request for Exclusion;"
- 2) Your full name and current address;
- 3) Your personal signature; and
- 4) At the top of your written Request for Exclusion, the words "Request for Exclusion" or a similar statement that you do not want to participate in the Settlement.

The Request for Exclusion must be mailed to the Settlement Administrator at the following address **postmarked by February 23, 2024**:

Camping World Settlement Administrator
Exclusions
PO Box 6749
Portland, OR 97228-6749

Any Settlement Class Member who does not file a timely Request for Exclusion and does not follow the requirements listed here for a Request for Exclusion, will lose the opportunity to exclude themselves from the Settlement and will be bound by the Settlement.

You cannot exclude yourself by telephone or by email. A Request for Exclusion may only be done on an individual basis, and no person may request to be excluded from the Settlement Class through "mass" or "class" opt-outs.

18. If I opt out, can I get anything from the Settlement?

No. If you opt out, you are telling the Court you do not want to be part of the Settlement. You can only get settlement benefits if you stay in the Settlement.

19. If I do not opt out, can I sue Defendants for the same thing later?

No. Unless you opt out, you give up any right to sue the Released Persons (including Defendants) for all claims and other matters released in and by the Settlement Agreement Section K. You must opt out to start or continue with your own lawsuit or be part of any other lawsuit against the Released Persons (including Defendants) regarding the Released Claims. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can object to the Settlement or Fee Application, meaning tell the Court you do not agree with all or any part of the Settlement. You can object by either submitting a written objection or appearing at the Final Approval Hearing in person or via Zoom (see Question 22 for details regarding the time and

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

place of the Final Approval Hearing, which are subject to change, including how to access the hearing remotely). You can object either in person or remotely at the Final Approval Hearing, regardless of whether you have submitted a timely written objection.

Your written objection must include the following information:

- 1) The words “Camping World Objection;”
- 2) Your full name, current mailing address, and telephone number;
- 3) A statement of the specific grounds for the objection, as well as any documents supporting the objection;
- 4) A statement of whether the objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- 5) Identify all lawyer(s) representing you as the objector;
- 6) A statement regarding whether you as a Settlement Class Member (or your lawyer) intends to appear at the Final Approval Hearing either in person or remotely; and
- 7) Your signature or the signature of your lawyer.

Your written objection must be mailed to the Settlement Administrator at the following address **postmarked by February 23, 2024**:

Camping World Settlement Administrator
Objections
PO Box 6749
Portland, OR 97228-6749

If you object, you do not have to appear at the Final Approval Hearing. However, if you intend to attend the Final Approval Hearing, you must also file with the Court a notice of appearance.

If any attorney will represent you at the Final Approval Hearing, the notice of appearance filed with the Court must include:

- 1) The attorney’s name, address, phone number, and email address;
- 2) The state bar(s) to which the attorney is admitted, and associated bar numbers; and
- 3) A list of all objections to class action settlements the attorney has filed in the past three years, and the results of any such objections, including any sanctions issued by a court in connection with any such objections.

If you object and intend to call witnesses at the Final Approval Hearing, you must provide a list of any such witnesses, together with a brief summary of each witness’s expected testimony, at least thirty (30) days before the Final Approval Hearing.

21. What is the difference between objecting and asking to opt out?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class (meaning you do not opt out of the Settlement). Opting out of the Settlement is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt out, you cannot object to the Settlement.

THE FINAL APPROVAL HEARING

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **April 17, 2024, at 9:00 a.m.** before the Honorable Angelo Kappas, in courtroom 2020, 505 N. County Farm Road, Wheaton, IL 60187-0707. Instructions to access the Final Approval Hearing remotely via Zoom will be posted on the Settlement Website once available.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsels’ motion for attorneys’ fees, costs, and expenses, and Service Award Payments for each of the Settlement Class Representatives. If there are objections, the Court will consider them. The Court will also listen to people who have asked to speak or object at the hearing.

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.

Note: The date and time of the Final Approval Hearing are subject to change. The Court may also decide to hold the hearing via Zoom or by phone. Any change will be posted on the Settlement Website at www.CWGSDataSettlement.com.

Any Settlement Class Member can elect to object either in person or remotely via Zoom at the Final Approval Hearing, regardless of whether they have submitted a timely written objection.

23. Do I have to attend the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to attend the Final Approval Hearing to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so. Any Settlement Class Member can elect to object either in person or remotely at the Final Approval Hearing, regardless of whether they have submitted a timely written objection.

24. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must follow the instructions provided in Question 20 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will receive two (2) years of credit monitoring and an automatic cash Settlement Payment by check. You will also give up rights explained in the “Opting Out from the Settlement” section of this Notice, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit, etc. against the Released Persons (including Defendants) regarding the Released Claims in this lawsuit.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice summarizes the Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.CWGSDataSettlement.com, by calling 1-888-522-6906, or by writing to:

Camping World Settlement Administrator
PO Box 6749
Portland, OR 97228-6749

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT’S CLERKS OFFICE
REGARDING THIS NOTICE.**

Questions? Go to www.CWGSDataSettlement.com or call 1-888-522-6906.