NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Michael Toikach, et al. v. Christian Dior, Inc.
Case No. CACE 25-18776
Circuit Court for Broward County, Florida

IF YOU WERE NOTIFIED THAT YOUR PERSONAL INFORMATION MAY HAVE BEEN ACCESSED IN THE JANUARY 2025 CHRISTIAN DIOR DATA INCIDENT, YOU MAY BE ENTITLED TO BENEFITS FROM A CLASS ACTION SETTLEMENT.

A court has authorized this notice. This is not a solicitation from a lawyer.
You are not being sued.
Please read this Notice carefully and completely.

- A Settlement has been reached with Christian Dior, Inc. ("Dior" or "Defendant") in a class action lawsuit. This case is about a cybersecurity incident that occurred in January 2025, in which an unauthorized party was able to gain access to a Dior database that contained information about Dior clients (the "Data Incident"). The Dior database contained personal information such as first and last name; contact information; address; date of birth; and other information customers may have provided to Dior, such as government identification numbers and, in a small number of cases, Social Security number.
- The lawsuit is called *Michael Toikach, et al. v. Christian Dior, Inc.*, Case No. CACE 25-18776. It is pending in the Circuit Court for Broward County, Florida (the "Litigation").
- Dior denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- Dior's records indicate that you may be a Settlement Class Member, and entitled to benefits under the Settlement. You may have received a previous notice directly from Dior.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.cddatasettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator.	**May 25, 2026**
OPT-OUT OF THE SETTLEMENT	You can choose to opt-out of the Settlement and receive no Cash Payment or Credit Monitoring. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	**May 25, 2026**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt-out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement Class Member benefits.	**May 25, 2026**
DO NOTHING	Unless you opt-out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement. You will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved and released by this Settlement.	No Deadline

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

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION 3
WHO IS IN THE SETTLEMENT 4
THE SETTLEMENT BENEFITS 4
SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS 5
THE LAWYERS REPRESENTING YOU 6
OPTING OUT FROM THE SETTLEMENT 6
COMMENTING ON OR OBJECTING TO THE SETTLEMENT 7
THE COURT'S FINAL APPROVAL HEARING 8
IF I DO NOTHING 9
GETTING MORE INFORMATION 9

Basic Information

1. Why was this Notice issued?

The Circuit Court for Broward County, Florida, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Michael Toikach, et al. v. Christian Dior, Inc.*, Case No. CACE 25-18776. It is pending in the Circuit Court for Broward County, Florida. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Christian Dior, Inc., is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that in January 2025, an unauthorized party was able to gain access to a Dior database that contained information about Dior clients. The Dior database may have contained personal information such as first and last name; contact information; address; date of birth; and other information customers may have provided to Dior, such as government identification numbers and, in a small number of cases, Social Security number.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the "Plaintiffs" or "Class Representatives." Together, the people included in the class action are called a "Class" or "Class Members." One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this proposed Settlement, the Class Representatives are Michael Toikach; Beata Toikach; Raveen Bhatt; Portia Marie Smithson; Scott Holland; Ralph Nguyen; and Andy Ansryan. Everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. The Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The Court has defined the Settlement Class this way: "All U.S. individuals who were sent notice by Defendant that their Personal Information may have been impacted in the Data Incident."

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (a) all persons who are directors and officers of Defendant; (b) Defendant's legal representatives; (c) governmental entities; and (d) the Judge assigned to the Action, the Judge's immediate family, and Court staff.

If you are not sure whether you are a Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@cddatasettlement.com
- Call toll free, 24/7: 1-888-836-1708
- By mail: Dior Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at www.cddatasettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

All Settlement Class Members may claim **Credit Monitoring** and/or one or more of the **Cash Payment** options. The benefits are explained in more detail below.

CREDIT MONITORING. All Settlement Class Members are eligible to enroll in two years of CyEx Financial Shield Complete. This comprehensive service comes with $1 million of financial fraud insurance, and includes monitoring for:

- fraud or identity theft
- unauthorized financial transactions
- personal information associated with high-risk transactions

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

CASH PAYMENTS. Settlement Class Members who have eligible documented losses may claim **Cash Payment for Documented Losses**. Additionally, Settlement Class Members whose Social Security numbers were impacted in the Data Incident ("Tier 1 Settlement Class Members") may claim a $100.00 **Cash Payment**.

Cash Payment for Documented Losses. If you incurred actual, documented out-of-pocket costs or financial losses directly resulting from fraud and/or identity theft and directly related to the Data Incident, you can get back up to **$1,500.00**. The losses must have occurred between July 18, 2025, and March 11, 2026.

This benefit covers eligible out-of-pocket expenses like:

- losses because of identity theft or fraud
- fees for credit reports, credit monitoring, or freezing and unfreezing your credit

- cost to replace your IDs
- postage to contact banks by mail

You need to send proof, like receipts, to show how much you spent or lost. Your personal certifications, declarations, or affidavits do not constitute reasonable documentation to make a valid claim, but you may include that to provide clarification, context, or support for other submitted reasonable documentation showing that your expenses were because of the Data Incident.

You cannot claim a cash payment for expenses that have already been reimbursed by a third party.

Cash Payment for Tier 1 Settlement Class Members. In addition to the Cash Payment for Documented Losses, Settlement Class Members whose Social Security numbers were impacted in the Data Incident ("Tier 1 Settlement Class Members") may claim a one-time **$100.00** flat cash payment. You do not have to provide any proof or explanation to claim this payment. If you are a Tier 1 Settlement Class Member you were sent an Email or Postcard Notice that indicated you are eligible for this benefit.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@cddatasettlement.com
- Call toll free, 24/7: 1-888-836-1708
- By mail: Dior Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799-9958

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

If you stay in the Settlement Class, you won't be able to be part of any other lawsuit against Dior about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section XI) describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement is available at www.cddatasettlement.com.

Submitting a Claim Form for a Settlement Payment

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.cddatasettlement.com. If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Dior Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-888-836-1708, by email info@cddatasettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **May 25, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be received by the Settlement Administrator no later than **May 25, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a Final Approval Hearing on June 22, 2026 (***see* Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved. Please be patient.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Jeff Ostrow of Kopelowitz Ostrow P.A. and Mariya Weekes of Milberg PLLC, to represent you and other Settlement Class Members ("Class Counsel").

13. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the Court to approve up to $400,000.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by Dior.

Class Counsel will also ask for Service Award payments of $2,500.00 for each of the Class Representatives. Service Award payments will also be paid by Dior.

Opting-Out from the Settlement

15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called an Opt-Out Request.

If you opt-out, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you opt-out. However, you will keep any rights you may have to sue Dior on your own about the legal issues in this case.

The deadline to opt-out from the Settlement is **May 25, 2026**.

To be valid, your Opt-Out Request must have the following information:

(1) the name of the Litigation: *Michael Toikach, et al. v. Christian Dior, Inc.*, Case No. CACE 25-18776, pending in the Circuit Court for Broward County, Florida;

(2) your full name, mailing address, telephone number, and email address;

(3) personal signature; and

(4) the words "Opt-Out Request" or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Opt-Out Request to the Settlement Administrator at:

Dior Data Incident Settlement
ATTN: Exclusion Request
P.O. Box 25226
Santa Ana, CA 92799-9958

Your Opt-Out Request must be submitted and postmarked by **May 25, 2026**.

Commenting on or Objecting to the Settlement

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

If you are a Settlement Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have opted out from the Settlement (***see* Question 15**)

You must provide the following information for the Court to consider your objection:

(1) the name of the Litigation: *Michael Toikach, et al. v. Christian Dior, Inc.*, Case No. CACE 25-18776, pending in the Circuit Court for Broward County, Florida;

(2) your full name, mailing address, telephone number, and email address (if any);

(3) all grounds for the objection, accompanied by any legal support for the objection known to the objector or objector's counsel;

(4) the number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;

(5) the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Application for Attorneys' Fees, Costs, and Service Awards;

(6) the number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;

(7) whether the objector and/or his or her counsel will appear at the Final Approval Hearing;

(8) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any);

(9) a statement confirming whether the objector or their counsel intend to testify and/or argue at the Final Approval Hearing; and

(10) your signature (if you have hired your own lawyer, their signature is not sufficient).

For your objection to be considered, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **May 25, 2026**. You must also send a copy of the objection by U.S. Mail to the Settlement Administrator, Class Counsel, and Defendant's Counsel.

Clerk of the Court	Settlement Administrator
Clerk of the Court 201 S.E. 6th Street Fort Lauderdale, FL 33301	Dior Data Incident Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799-9958

Class Counsel	Counsel for Defendant
Jeff Ostrow **KOPELOWITZ OSTROW P.A.** 1 West Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 Mariya Weekes **Milberg PLLC** 333 SE 2nd Avenue, Ste. 2000 Miami, FL 33131	Wesley Sze **GIBSON, DUNN & CRUTCHER LLP** 310 University Ave. Palo Alto, CA 94301

17. What is the difference between objecting and excluding?

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

The Court's Final Approval Hearing

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

The Court will hold a final approval on **June 22, 2026 at 10:30 a.m. Eastern Time**, via Zoom (Meeting ID: 111-475-745).

At the Final Approval Hearing, the Court will decide whether to approve the Settlement. The Court will also decide Class Counsel's request for an attorneys' fees and costs award and the request for a Service Award to the Class Representatives. The Court will also consider any timely objections to the Settlement.

If you are a Settlement Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (***See* Question 16**).

The date and time of this hearing may change without further notice. Please check www.cddatasettlement.com for updates.

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

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

Getting More Information

21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, www.cddatasettlement.com.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@cddatasettlement.com
- Call toll free, 24/7: 1-888-836-1708
- By mail: Dior Data Incident Settlement
  c/o Settlement Administrator
  P.O. Box 25226
  Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 201 S.E. 6th Street, Fort Lauderdale, FL 33301.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT

Public court record.

This copy was downloaded from https://cw.simpluris.com/docs/public/downloads/CTC/LONG_FORM_
on 2026-11-02 and is hosted, unaltered, for reference at
https://chimo.ai/class-action/christian-dior

Court: Circuit Court for Broward County, Florida
Case number: CACE 25-18776

Chimo hosts public court records for readers' reference; documents are
unaltered copies from the court docket or the court-approved settlement website.