

Class Action Settlement Notice

If you were a member of a LifeLock identity theft protection plan at any time between September 1, 2010, and January 20, 2016, you are eligible to receive a cash payment.

The sole purpose of this notice is to inform you of the proposed Settlement so that you may decide what to do.

WHAT IS THIS CASE ABOUT? A proposed Settlement has been reached in the nationwide class action lawsuit, *Ebarle, et al. v. LifeLock, Inc.*, Case No. 3:15-CV-00258 (HSG) ("Lawsuit"). This Lawsuit challenges representations LifeLock made, which generally fall into four categories: (1) LifeLock's promise to provide "comprehensive" services in detecting fraud; (2) LifeLock's promise to provide timely and continuous alerts of potential fraud 24 hours a day, 7 days a week, 365 days a year; (3) LifeLock's promise regarding its information security program; and (4) LifeLock's promise to provide a "\$1 Million Total Service Guarantee." LifeLock denies all allegations or that it did anything wrong. Under the proposed Settlement, LifeLock has agreed to pay \$68 million to a Settlement Fund.

WHO IS INCLUDED? If you were a member of a LifeLock identity theft protection plan at any time between September 1, 2010 and January 20, 2016, you are a **Class Member**. If you enrolled in a LifeLock identity theft protection plan between January 1, 2012, and April 30, 2015, you are **also** a **Subclass Member**.

HOW DO I GET A CASH PAYMENT IF THE SETTLEMENT IS APPROVED? All Class members may submit a Claim Form to receive a cash payment. Subclass Members who do not exclude themselves from the Settlement will receive a cash payment regardless of whether they submit a claim, but will receive an **additional** payment under the Settlement if they submit a valid claim. Subclass Members will likely receive between about **\$34** and **\$39** if they **do** make a claim and between about **\$14** and **\$19** if they **do not** make a claim. All other Class Members will likely receive **\$20** if they **do** make a claim and **nothing** if they **do not** make a claim. Actual payment amounts could be less than the above estimates. Claim Forms may be obtained at www.EbarleClassSettlement.com and may be submitted online or downloaded and mailed or emailed to the Settlement Administrator at the address below. For a **Claim Form to be considered it must be submitted online or emailed or postmarked by April 29, 2016.**

YOUR OTHER OPTIONS.

Exclude Yourself: If you don't want to be bound by the Settlement and any judgment in the Lawsuit, you can exclude yourself by emailing or mailing to the Settlement Administrator at the address below a written request stating (1) your full name and address and (2) requesting to be excluded from the Settlement. This request must be emailed or postmarked by **April 14, 2016**. If you exclude yourself, you won't get a cash payment from this Settlement. If you don't exclude yourself and the Settlement is approved, you will be bound by its terms and cannot later sue LifeLock about the claims in the Lawsuit.

Object to the Settlement: If you don't exclude yourself, you may object to the Settlement. Any objection must be made in writing and emailed or mailed to the Settlement Administrator at the address below, and must be emailed or postmarked by **April 14, 2016**. You may object to the Settlement and also submit a claim for a payment under the Settlement.

Attend the Hearing: The Court will hold a hearing on **June 23, 2016, at 2:00 p.m.**, to consider whether to approve: (1) the Settlement; (2) up to \$10.2 million in attorneys' fees and expenses to Class Counsel; and (3) service awards of \$2,000 to each Class Representative. You may appear at the hearing, but you don't have to. You may hire your own attorney to appear for you.

CLASS COUNSEL'S FEE REQUEST. Class Counsel intends to ask the Court to award attorneys' fees and expenses of up to \$10,200,000, and to award a \$2,000 service award to each of the four Class Representatives. Class Counsel's fee and service award application will be available at www.EbarleClassSettlement.com by **March 18, 2016**. Class Members may object to Class Counsel's fee application by writing or emailing the Settlement Administrator at the address below. Any objection must be emailed or postmarked by **April 14, 2016**.

SETTLEMENT ADMINISTRATOR'S ADDRESS. Claim forms, requests for exclusion, or objections to the Settlement may be mailed to Ebarle v. LifeLock, Inc. Settlement, c/o Garden City Group, P.O. Box 10248, Dublin, OH 43017, or may be emailed to info@EbarleClassSettlement.com.

For more information or to submit a claim online, visit www.EbarleClassSettlement.com or call 1 (855) 907-3140.

A federal court authorized this notice. This isn't a solicitation from a lawyer. You aren't being sued.

855-907-3140

www.EbarleClassSettlement.com