

CUYAHOGA COUNTY COURT OF COMMON PLEAS

If you purchased a CPAP machine from Worksteps, Inc. between January 1, 2022, and December 31, 2024, by making an initial down payment and three subsequent monthly payments, You may be entitled to Benefits From a Class Action Settlement.

The Cuyahoga County Court of Common Pleas authorized this class action notice.

This is not a solicitation from a lawyer.

- ❖ The Settlement resolves a lawsuit over the practices of WorkSTEPS, Inc. (“WSI”) with regard to the purchase and financing of CPAP machines.
- ❖ The Settlement avoids costs and risks to the parties from continuing the lawsuit, pays money to class members who paid money to WSI to finance the purchase of a CPAP machine.

Your Legal Rights and Options in This Settlement	
Accept the Settlement Benefits	You will receive the benefits under the Settlement automatically if the Court approves the Settlement. You don’t have to do anything. In accepting the benefits of the Settlement, you give up any rights to sue WSI or anyone else about your contract and the legal claims that were made or could have been made in this lawsuit.
Object to the Settlement	Write to the Court about why you don’t like the Settlement.
Opt Out of the Class	Get no Settlement benefits. This option allows you to bring your own lawsuit, at your own expense, for the same legal claims in this lawsuit.

- ❖ **The two sides disagree on how much money could have been won if the Class won at trial or if the Class would have won at all.**
- ❖ **In addition to providing you with benefits, this Settlement affects your legal rights, as described below. Read this notice carefully.**
- ❖ **Your rights and options are explained in this notice (the “Notice”). To opt out or object, you must act before Tuesday, July 21, 2026.**
- ❖ **The Court still has to decide whether to approve the Settlement. Payments as described in this Notice will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.**
- ❖ **Any questions? Read on.**

Basic Information

1. Why did I get this Notice?

WSI’s records show that you purchased a CPAP machine from WSI between January 1, 2022, and December 31, 2024, by making an initial down payment and three subsequent monthly payments.

The Court ordered that you be sent this notice because you have a right to know about the proposed Settlement and your options before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, WSI will make the payments provided for by the Settlement .

This notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, and how to get them. The Court in charge of the case is the Cuyahoga County Court of Common Pleas, and the case is known as *Herman Ragland v. WorkSTEPS, Inc.*, Case No. CV-23-990433. Herman Ragland (“Mr. Ragland”) is the individual who filed the class action lawsuit.

2. What is this lawsuit about?

Mr. Ragland purchased a CPAP machine from WSI, which it offered to finance. Mr. Ragland decided to finance the machine and made a downpayment and three subsequent

monthly payments. Mr. Ragland alleges that in financing the machine, WSI did not make the proper financing disclosures. WSI denies Ragland's allegations, denies that it is liable for any claims asserted in the Litigation, and denies that any Settlement Class Member incurred damages resulting from such claims.

3. What is a class action and who is involved?

In a class action, one or more people called a "Class Representative" (in this case, Mr. Ragland) sued on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." One court resolves the issues for everyone in the Class. Judge Michael P. Shaughnessy (the "Judge") is the judge in charge of this class action.

4. Why is there a Settlement?

The Court has not decided in favor of Mr. Ragland or WSI. Mr. Ragland believes he would have won at trial and WSI thinks it would have won, but there was no trial. Instead, both sides have agreed to settle this matter. Settlement is favored to avoid the costs of trial and ensure that the Class will be compensated. The Class Representative and Class Counsel think the Settlement is best for all Class Members.

Who Is in the Settlement

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

You were sent this notice because WSI's records show that you fit the definition of a Class Member.

You are in the class if: purchased a CPAP machine from WSI between January 1, 2022, and December 31, 2024, by making an initial down payment and three subsequent monthly payments.

You are *not* in the class if: IF YOU DID NOT purchase a CPAP machine from WSI between January 1, 2022, and December 31, 2024, by making an initial down payment and three subsequent monthly payments.

The Settlement Benefits - What You Get

6. What does the Settlement provide?

WSI has agreed to establish a fund of \$235,000.00 (the "Settlement Fund") to pay class members, a class representative incentive payment to Mr. Ragland, and attorneys' fees awarded by the Judge to Class Counsel.

WSI will make a payment to each of the approximately 322 Class Members who do not seek to exclude themselves from the settlement in an amount proportionate to the amount each Class Member paid to WSI, not to exceed \$110,000.00 in total.

The Lawyers Representing You

7. Do I have a lawyer in this case?

The Court has decided that the following lawyer is qualified to represent you and all Class Members. This lawyer is referred to as "Class Counsel" in this Notice:

Ronald I. Frederick, Esq.
Frederick & Berler LLC

767 East 185th Street
Cleveland, Ohio 44119

He is experienced in handling similar cases. More information about this attorney, his practice, and his experience is available at www.clevelandconsumerlaw.com.

8. How will the lawyers be paid?

Class Counsel has been litigating this case since 2023 and has incurred substantial legal fees to date. Class Counsel will ask the Court to approve payment of an amount not greater than \$125,000.00 to him for attorneys' fees and expenses, and payment of \$7,500.00 to Mr. Ragland for his services as Class Representative. On or before **Tuesday, August 4, 2026**, Class Counsel will file a Motion and a Memorandum in Support detailing their fee request. These pleadings will be available for your review on the Court's docket at. The fees would pay Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement. No fees and expenses are payable unless the Court finds them reasonable. The fees, expenses, and payments that the Court awards will be paid from the Settlement Fund established by WSI. WSI has agreed not to oppose an award of Class Counsel's fees and expenses up to the amount referenced immediately above.

Objecting to the Settlement

You can tell the Court that you don't agree with the Settlement or some part of it.

9. How do I tell the Court I don't like the Settlement?

To object, you must send a letter saying that you object to the proposed WSI settlement in *Herman Ragland v. WorkSTEPS, Inc.*, Case No. CV-23-990433. A written objection must include the name of the Lawsuit, the Class Member's full name, current mailing address and telephone number, a statement of the specific grounds for the objection, as well as any documents supporting the objection, the identity of and contact information for any attorney representing the objector, a statement regarding whether the Settlement Class Member or their attorney intends to appear at the Final Approval Hearing, a statement

identifying all class action settlements objected to by the Settlement Class Member in the previous five years, and the signature of the Settlement Class Member or their attorney.

Any class member who fails to timely file and serve an objection and notice shall not be treated as having filed a valid objection to the settlement and shall forever be barred from raising any objection to same.

Any objection must be received by the Court no later than **Tuesday, July 21, 2026**. Mail the objection to these three different places:

Court	Class Counsel	Defense Counsel
Cuyahoga County Court of Common Pleas 1200 Ontario Street, 1 st Floor Cleveland, OH 44113	Ronald I. Frederick Frederick & Berler LLC 767 East 185 th Street Cleveland, Ohio 44119	Craig C. Dilger Benjamin M. Fiechter Stoll Keenon Ogden, PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507

Opting Out of the Settlement

You can opt out of the Settlement.

10. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must send a letter saying that you want to be excluded from the WSI Settlement Class in *Herman Ragland v. WorkSTEPS, Inc.*, Case No. CV-23-990433. You must include your full name, current mailing address, and telephone number. The letter must be personally signed by you (NOT electronically signed) and include the statement: "I/we request to be excluded from the proposed WSI class settlement in *Herman Ragland v. WorkSTEPS, Inc.*, Case No. CV-23-990433. Your request to be excluded must be received by **Tuesday, July 21, 2026**. You cannot opt out by phone or by email. If you request to be excluded, any co-obligor on your account will

also be deemed to be excluded. You must send your opt-out notices to the following three places:

Court	Class Counsel	Defense Counsel
Cuyahoga County Court of Common Pleas 1200 Ontario Street, 1 st Floor Cleveland, OH 44113	Ronald I. Frederick Frederick & Berler LLC 767 East 185 th Street Cleveland, Ohio 44119	Craig C. Dilger Benjamin M. Fiechter Stoll Keenon Ogden, PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507

The Court's Fairness Hearing

The Court will hold a hearing to decide whether to approve the Settlement. You may attend, but you don't have to.

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

The proposed Settlement must be finally approved by the Court to go into effect. On **Tuesday, August 11, 2026**, in the Cuyahoga County Court of Common Pleas, a hearing will be held on whether the proposed Settlement should be approved as fair, reasonable, and adequate. The Court is located at 1200 Ontario Street, Cleveland, OH 44113. If there are objections, the Court will consider them. The Fairness Hearing will be limited to argument by counsel for the Parties and argument by any objector or objector's counsel who have submitted an objection in compliance with this Agreement and the Preliminary Approval Order. The Court may decide how much to pay to Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

12. Do I have to come to the hearing?

No, you do not have to come to the hearing. Class Counsel will answer questions Judge Michael P. Shaughnessy may have. But you are welcome to come. If you send an

objection, you don't have to come to Court to talk about it. As long as your written objection was received on time and complies with the requirements in this notice, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

If You Do Nothing

13. What happens if I do nothing at all?

If you do nothing and the Settlement is approved by the Court, you'll receive the cash payment as outlined above. By accepting these benefits, you release your right to bring a lawsuit against WSI relating to your account or contract or bring a lawsuit against anyone else about the legal issues in this case.

Getting More Information

14. Additional Information.

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement from the website at www.workstepssettlement.com. Questions or requests for information should **NOT** be directed to the Court. Should you have questions that are not answered by this notice, contact WSI's Counsel or Class Counsel at the addresses provided above.