

If you currently own or rent property or reside in the Lower Umatilla Basin Groundwater Management Area, you may be eligible to receive benefits from a class action settlement.

SI DESEA RECIBIR ESTA NOTIFICACIÓN EN ESPAÑOL, LLÁMENOS A 1-877-317-7870 O VISITE NUESTRA PÁGINA WEB A WWW.EASTERNOREGONWATERSETTLEMENT.COM

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

- A \$20.5 million settlement has been reached in a class action lawsuit against Amazon Data Services, Inc. (“ADS” or “Defendant”). The lawsuit alleges that millions of gallons of wastewater from ADS’s data centers and operations of other parties’ facilities in the Lower Umatilla Basin Groundwater Management Area (“LUBGWMA”) in Morrow and Umatilla Counties in Oregon contribute to nitrate pollution in the groundwater in the LUBGWMA. The lawsuit also alleges that nitrates are dangerous to human health and the environment, and that drinking nitrate-contaminated water poses serious health risks. Defendant denies any wrongdoing or liability.
- **If you currently own or rent property or reside in the LUBGWMA, you are part of the Settlement Class and will be able to apply to receive benefits from the Settlement at a later date.** The Settlement Fund will be used to pay for the following projects:

Private Well Projects: Settlement Funds will be available to pay for extending or altering private drinking water wells to reach the “basalt” aquifer in LUBGWMA for Settlement Class Members who submit a claim form. You must have 1) an existing drinking water well with recent sampling results exceeding any Safe Drinking Water Act levels or showing nitrate concentrations exceeding 70% of applicable Safe Drinking Water Act levels and 2) the target “basalt” aquifer is an accessible and a cleaner source of drinking water. Settlement Class Members will be sent additional notice regarding how to submit a claim form for Private Well Projects at a later date. If you are a Settlement Class Member and you meet the requirements for a Private Well Project, you will be able to submit a claim form at a later date to apply for funding for a Private Well Project.

Public Infrastructure Projects: Settlement Funds will be available at a later date to pay for public infrastructure projects that: 1) Extend water supply pipelines to households using private wells, currently not connected to public drinking water systems. This would provide a new source of clean drinking water. 2) Allow utilities to access additional sustainable sources of clean drinking water. 3) Treat wastewater to remove or reduce contamination by lowering the amount of contamination that return to drinking water aquifer. 4) Maintain or improve the public drinking water or public wastewater treatment systems to lower the costs of making sure clean drinking water is available in public water systems. **You do not need to submit a claim form.**

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

Your Legal Rights & Options		Deadline
Exclude Yourself	Keep your right to file a lawsuit against ADS and the Released Parties for the Released Claims involved in this Settlement.	Postmarked by: September 8, 2026
Object to the Settlement	Stay in the Settlement but tell the Court why you do not agree with the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed by: October 8, 2026
Do Nothing	You do not need to do anything now. If you do nothing now, you will give up your legal rights to sue ADS about the Released Claims involved in this Settlement.	

Questions? Go to EasternOregonWaterSettlement.com or call 1-877-317-7870

At a Later Date – Submit a Claim Form	The only way to apply for funding for a Private Well Project is to submit a claim form at a later date. No claim form is required for Public Infrastructure Projects.	No deadline now. Notice will be sent when claim forms can be submitted at a later date.
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BASIC INFORMATION

1. Why is this Notice being provided?

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

The Honorable Michael H. Simon, United States District Judge for the District of Oregon, is overseeing this class action. The lawsuit is known as *Pearson et al. v. Amazon Data Services, Inc.*, Case No. 2:26-cv-00633. The people who filed this lawsuit are called Plaintiffs, and the company they sued, Amazon Data Services, Inc., is the Defendant.

2. What is this lawsuit about?

The Plaintiffs allege that ADS's operation of data centers in the Lower Umatilla Basin Groundwater Management Area ("LUBGWMA") contributes to nitrate pollution in the groundwater in the LUBGWMA, located in Morrow and Umatilla Counties in Oregon. ADS denies these allegations and denies any wrongdoing or liability. The Court has not made a decision of any wrongdoing by ADS or that any law has been violated. Instead, the Plaintiffs and ADS have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

Although Plaintiffs have reached a Settlement with ADS in this lawsuit, Plaintiffs have a separate related lawsuit still going against additional Non-Settling Defendants known as *Pearson v. Port of Morrow et al.*, Case No. 2:24-cv-00362, District of Oregon. For the Non-Settling Defendants, there may be separate settlements, judgments, or class certification orders and you may be sent a separate notice at a later date.

3. Why is the lawsuit a class action?

In a class action, one or more people called Class Representatives sue on behalf of other people who have similar legal claims. Together, the people are a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt-out) from the class.

4. Why is there a Settlement?

The Plaintiffs and Defendant have agreed to settle the lawsuit. The Class Representatives and their lawyers believe the Settlement is best for Settlement Class Members because of the Settlement benefits available and the risks and uncertainty of continuing the lawsuit.

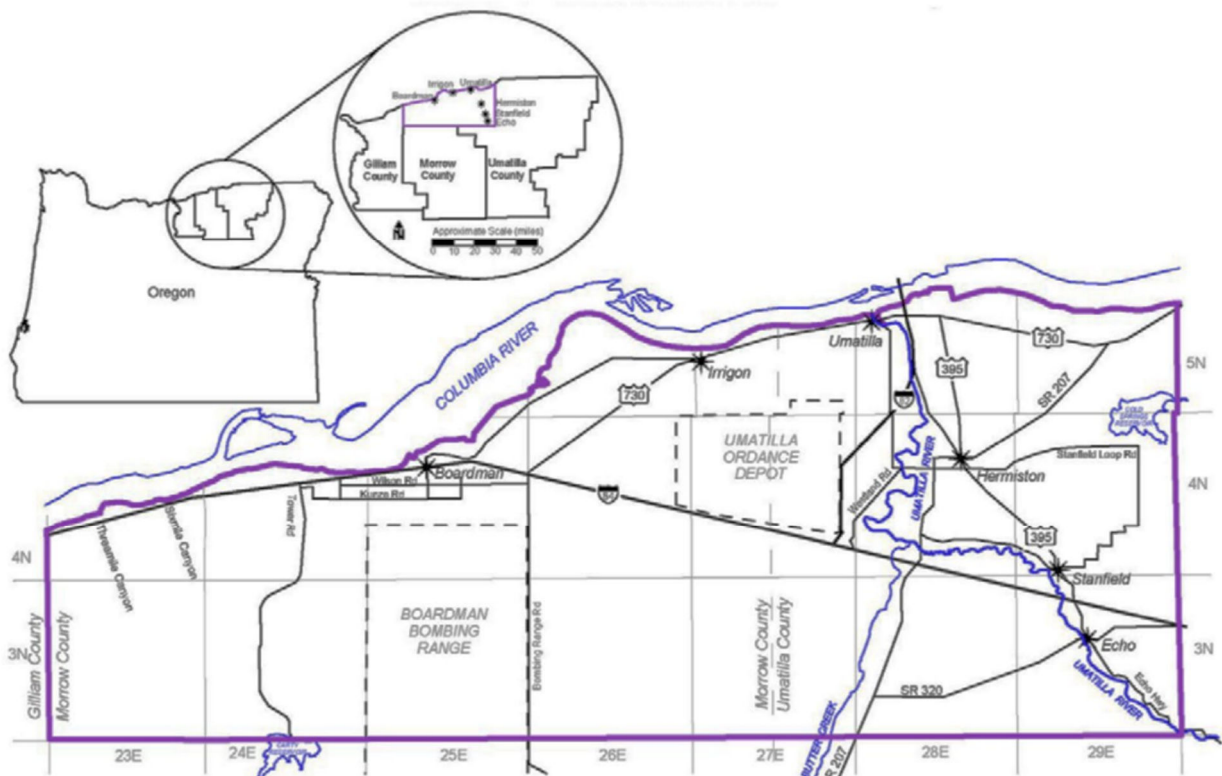
WHO IS INCLUDED IN THE SETTLEMENT

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

You are a Settlement Class Member if the following Settlement Class definition applies to you: **all Persons who currently own or rent property or reside in the Lower Umatilla Basin Groundwater Management Area (LUBGWMA).**

The LUBGWMA covers the area outlined in purple in the map below:

- North boundary is the Columbia River;
- South boundary is the 2N/3N Township Boundary;
- East boundary is the 29E/30E Range Boundary; and
- West boundary is the 22E/23E Range Boundary (Morrow County and Gilliam County line).



Excluded from the Settlement Class are: (i) ADS; (ii) any entity in which ADS has a controlling interest; (iii) any Person with a controlling interest in ADS; (iv) any current or former officer or director of ADS; (v) the legal representatives, successors, or assigns of ADS; (vi) the Court, the Court's immediate family, and Court staff; and (vii) all attorneys and employees of Class Counsel.

6. 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 www.EasternOregonWaterSettlement.com or call toll-free at 1-877-317-7870.

Questions? Go to EasternOregonWaterSettlement.com or call 1-877-317-7870

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

Settlement Fund – As a result of the Settlement, ADS has agreed to pay \$20.5 million into a Settlement Fund. **If you currently own or rent property or reside in the LUBGWMA, you are a Settlement Class Member and can receive benefits from the Settlement.** The Settlement Fund will be used to pay for the following projects:

- **Private Well Projects:** Settlement Funds will be available to pay for extending or altering private drinking water wells to reach the “basalt” aquifer in LUBGWMA for Settlement Class Members who submit a claim form. You must have 1) an existing drinking water well with recent sampling results exceeding any Safe Drinking Water Act levels or showing nitrate concentrations exceeding 70% of applicable Safe Drinking Water Act levels and 2) the target “basalt” aquifer is an accessible and a cleaner source of drinking water. Settlement Class Members will be sent additional notice regarding how to submit a claim form for Private Well Projects at a later date. If you are a Settlement Class Member and you meet the requirements for a Private Well Project, you will be able to submit a claim form to apply for funding for a Private Well Project.
- **Public Infrastructure Projects:** Settlement Funds will be available at a later date to pay for public infrastructure projects that: 1) Extend water supply pipelines to households using private wells, currently not connected to public drinking water systems. This would provide a new source of clean drinking water. 2) Allow utilities to access additional sustainable sources of clean drinking water. 3) Treat wastewater to remove or reduce contamination by lowering the amount of contamination that return to drinking water aquifer. 4) Maintain or improve the public drinking water or public wastewater treatment systems to lower the costs of making sure clean drinking water is available in public water systems. **You do not need to submit a claim form.**

The following items will be deducted from the Settlement Fund: attorneys’ fees and reimbursement of costs and expenses to Class Counsel and Service Awards in an amount to be approved by the Court; Settlement administration costs (including settlement administration services, distribution costs, etc.); and after such payments, the remaining “net settlement amount” will be used to provide funding to Settlement Class Members who have submitted a valid claim form, at a later date, and to fund Public Infrastructure Projects. You may benefit from Public Infrastructure Projects whether you submit a claim form or not.

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

Unless you exclude yourself (opt-out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all the Court’s orders and judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against ADS and Released Parties about the legal claims in this lawsuit that are released by the Settlement Agreement. The rights you are giving up are called “Released Claims.” If you remain a Settlement Class Member you will be able to submit a claim form for Private Well Projects at a later date and receive the benefit of Public Infrastructure Projects.

9. Where can I find out about the rights that I give up if I stay in the Settlement Class?

The rights that you give up if you stay in the Settlement Class are discussed in the Settlement Agreement in Section X.A (titled “Released Claims”), which describes the Release, Released Parties, and Released Claims in necessary legal terminology. Please read these sections carefully.

Questions? Go to EasternOregonWaterSettlement.com or call 1-877-317-7870

The Settlement Agreement is available at www.EasternOregonWaterSettlement.com. For questions regarding the Release, you can also contact Class Counsel listed below for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

10. Can I submit a claim form now?

No, you cannot submit a claim form at this time. Information regarding the claims process will be provided in a notice at a later date. Contact Class Counsel if you have any questions.

11. When will I receive funding for my Private Well Project?

Information regarding the process for submitting a claim to receive funding for Private Well Projects will be provided in a notice at a later date. Contact Class Counsel if you have any questions prior.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this lawsuit?

Yes, the Court has appointed Hagens Berman Sobol Shapiro LLP, Heenan & Cook, and Bliven Law Firm, PC as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You will not be charged for Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

Hagens Berman Sobol Shapiro LLP 1301 Second Ave., Suite 2000 Seattle, WA 98101	Heenan & Cook 2224 Montana Avenue Billings, MT 59101	Bliven Law Firm, PC 704 S. Main Street Kalispell, MT 59901
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13. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court to award attorneys’ fees and reimbursement of costs and expenses. Class Counsel will also ask the Court to approve Service Awards of \$5,000 to be paid to each Class Representative for their efforts in achieving the Settlement. If awarded by the Court, attorneys’ fees and reimbursement of costs and expenses, and the Service Awards will be paid from the Settlement Fund. The Court may award less than the amounts requested for attorneys’ fees and reimbursement of costs and expenses, and Service Awards.

Class Counsel’s motion for attorneys’ fees and reimbursement of costs and expenses, and Service Awards will be made available on the Settlement Website at www.EasternOregonWaterSettlement.com before the deadline for you to object to the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain eligible to receive funding for a Private Well Project and you want to keep the right to sue or continue to sue ADS and the Released Parties on your own about the legal issues in this lawsuit, then you must take steps to get out of the Settlement Class. This is called excluding yourself from—or “opting out” of—the Settlement Class.

14. How do I get out of the Settlement?

To exclude yourself from the Settlement Class, you must mail a written request for exclusion or submit electronically by email, which includes the following:

1. The case name *Pearson v. Amazon Data Services, Inc.*, Case No. 2:26-cv-00633 (D. Or.);
2. Your full name, current mailing address, and email address (if available);
3. Your signature; and
4. A clear statement that you want to be excluded from the Settlement Class, such as “I hereby request to be excluded from the Settlement Class in *Pearson v. Amazon Data Services, Inc.*, Case No. 2:26-cv-00633 (D. Or.)”

The exclusion request must be sent to the Settlement Administrator at the following address **postmarked or submit electronically by email and received** at the following email address by **September 8, 2026**:

Pearson v. Amazon Data Services, Inc.,
Settlement Administrator
PO Box 2855
Portland, OR 97208-2855
info@EasternOregonWaterSettlement.com

You cannot exclude yourself by telephone, and you cannot opt out on behalf of anyone else.

You may not request to be excluded from the Settlement Class through “mass” or “class” opt-outs, meaning that each Person who seeks to be excluded must send an individual, separate request to the Settlement Administrator that complies with all requirements listed above.

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

15. If I exclude myself, can I get funding for a Private Well Project from the Settlement?

No. If you exclude yourself, you cannot receive funding for a Private Well Project from this Settlement. You can only get funding for a Private Well Project if you stay in the Settlement and submit a valid claim form. More information on when and how to submit a claim form will be provided at a later date.

16. If I do not exclude myself, can I sue ADS for the same thing later?

No. Unless you exclude yourself, you give up any right to sue ADS and the Released Parties about the legal claims that are released by the Settlement. You must exclude yourself from this lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against ADS and the Released Parties about the Released Claims in this lawsuit. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you may object to the Settlement, including the Fee Award or Service Awards, by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the current Settlement.

Questions? Go to EasternOregonWaterSettlement.com or call 1-877-317-7870

To object, you must file your written objection with the Court electronically or mail it to the Court by **October 8, 2026**. Your objection must state that you object to the Settlement in *Pearson v. Amazon Data Services, Inc.*, Case No. 2:26-cv-00633 (D. Or.).

To file an objection, you cannot exclude yourself from the Settlement Class. Your objection must include the following information:

1. Your full name and address;
2. The name and address of your lawyer, if any;
3. Identify any and all agreements that relate to the objection or the process of objecting-whether written or oral-between you or your lawyer and any other person;
4. A statement of each objection to the Settlement Agreement;
5. Provide a detailed description of the facts and supporting documentation for each objection;
6. Specifically cite to the legal authorities underlying each objection, if any;
7. State whether you or your lawyer intends to appear at the Fairness Hearing and, if so, provide a list of witnesses who may be called to testify at the Fairness Hearing, either live or by deposition or affidavit, if any, and a list of exhibits, along with copies of the exhibits, that you may offer during the Fairness Hearing, if any;
8. State the number of times you have objected to a class action settlement within the five (5) years preceding the date that you file the objection and the caption of each case in which you have made such objection; and
9. Your signature (signature by a lawyer is not sufficient).

Speaking at the Fairness Hearing. If you want to speak at the Fairness Hearing to object to the Settlement you must state that in your written objection. If you do not file a timely written objection with the requirements listed above, you will waive any objections and will be prohibited from making any objection (whether by appeal or otherwise) to the Settlement. If you are not a Settlement Class Member, you may not object to the Settlement.

If You Hire Your Own Lawyer to Represent You for Your Objection. If your lawyer wants to appear at the Fairness Hearing, your lawyer must file, through the Federal Court CM/ECF system, a Notice of Appearance in this lawsuit no later than ten (10) days before the originally-scheduled date of the Fairness Hearing (if the Fairness Hearing is continued, the deadline runs from the first-scheduled Fairness Hearing).

The Parties may seek expedited discovery from an objecting Settlement Class Member regarding the basis for an objection, to allow them to appropriately respond to the objection. Failure by the objecting Settlement Class Member to comply with expedited discovery requests may result in the Court striking the Settlement Class Member's objection and otherwise denying that Settlement Class Member the opportunity to make an objection or speak at the Fairness Hearing.

18. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court you do not like something about the Settlement. Requesting exclusion (opting out) is telling the Court you do not want to be part of the Settlement Class. If you exclude yourself, you cannot object to the Settlement.

THE FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on **January 12, 2027**, at **10:00 a.m.** before the Honorable Michael H. Simon, United States District Judge for the United States District Court for the District of Oregon, Mark O. Hatfield United States Courthouse, 1000 Southwest Third Avenue, Room 1527, Portland,

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Oregon 97204-2944. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and decide whether to approve the Settlement, Class Counsel's Fee Award and the Service Awards to the Class Representatives.

If there are objections, the Court will consider them. If you submit a timely, written objection, and you would like to speak at the hearing, you must state in your objection that you wish to speak at the Fairness Hearing to object to the Settlement. If you file a timely, written objection and you hire your own lawyer and your lawyer would like to appear at the Fairness Hearing, your lawyer must file, through the Federal Court CM/ECF system, a Notice of Appearance in the lawsuit no later than ten (10) days before the originally-scheduled date of the Fairness Hearing (if the Fairness Hearing is continued, the deadline runs from the first-scheduled Fairness Hearing).

Note: The date and time of the Fairness Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via Zoom or telephone. You should check the Settlement Website www.EasternOregonWaterSettlement.com for up-to-date information about the Fairness Hearing.

20. Do I have to attend the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. You cannot speak at the Fairness Hearing unless you object and follow the requirements for requesting to speak. If you file an objection, you do not have to attend the Fairness Hearing to talk about it. As long as you file your written objection on time, the Court will consider it.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and do nothing now, you will give up your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against ADS and the Released Parties about the legal claims that are released by the Settlement.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.EasternOregonWaterSettlement.com. You may get additional information at www.EasternOregonWaterSettlement.com, by calling toll-free 1-877-317-7870, or by writing to:

Pearson v. Amazon Data Services, Inc.,
Settlement Administrator
PO Box 2855
Portland, OR 97208-2855

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE
REGARDING THIS NOTICE, THE SETTLEMENT OR THE CLAIM PROCESS.**

Questions? Go to EasternOregonWaterSettlement.com or call 1-877-317-7870