

SUPREME COURT  
STATE OF NEW YORK MONROE COUNTY  
KYRSTEN BAIREZ -RODRIGUEZ, on behalf of herself  
and all others similarly situated,

Plaintiffs,

v.

ST. FRANCIS COLLEGE,

Defendant.

Index No.  
E2022006634

CLASS ACTION SETTLEMENT AGREEMENT AND RELEASE

This Class Action Settlement Agreement and Release is entered into between and among Plaintiff Kyrsten Baires-Rodriguez, individually and on behalf of all others similarly situated, and Defendant St. Francis College, a not-for-profit corporation organized under the laws of the State of New York and having its principal office in the County of Monroe. This action is brought pursuant to Article 9 of the Civil Practice Law and Rules;

WHEREAS, the above-captioned action is pending in the Court, alleging, inter alia, that St. Francis failed to adequately secure personal identifiable information of its students and employees that may have been compromised in a data security incident which occurred on or about November/December 2018;

WHEREAS, Plaintiffs and Class Counsel believe that the factual and legal claims asserted in the Action are meritorious. Class Counsel has investigated the facts relating to the claims and defenses alleged and the underlying events in the Action, have made a thorough study of the legal principles applicable to the claims and defenses asserted in the Action, and have conducted a thorough assessment of the strengths and weaknesses of the claims in the Action;

WHEREAS, St. Francis asserts numerous legal and factual defenses to the claims made in the Action, and specifically denies each and all of the claims and contentions alleged against it in the Action, and denies all charges of wrongdoing or liability as alleged, or which could be alleged, in the Action;

WHEREAS, the Parties participated in mediation on November 11, 2021 with Hon. Morton Denlow (Ret.) serving as mediator;

















































































































