

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
FOR PERSONS WHOSE PRIVATE INFORMATION WAS ALLEGEDLY DISCLOSED
TO FACEBOOK AS A RESULT OF FROEDTERT'S USE OF THE META PIXEL ON ITS
MY CHART PORTAL BETWEEN FEBRUARY 1, 2017, AND MAY 23, 2022**

**All persons whose Private Information may have been shared in connection with the Website
Usage Disclosure.**

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

**THIS IS A NOTICE OF A SETTLEMENT OF A CLASS ACTION LAWSUIT.
THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.**

YOUR LEGAL RIGHTS ARE AFFECTED EVEN IF YOU DO NOTHING.

PLEASE READ THIS NOTICE CAREFULLY.

**YOU MAY BE ENTITLED TO PARTICIPATE IN A CLASS ACTION
SETTLEMENT BECAUSE YOUR PRIVATE INFORMATION
MAY HAVE BEEN SHARED WITH FACEBOOK BY FROEDTERT HEALTH, INC. IF
YOU ACCESSED YOUR MYCHART PORTAL ON THEIR WEBSITE BETWEEN
FEBRUARY 1, 2017, AND MAY 23, 2022.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM BY October 5, 2023	If you submit a Claim Form by October 5, 2023 , you may receive a pro rata share of the Settlement Fund as compensation for your injuries. You must timely submit a Claim Form either via U.S. mail or online to receive monetary compensation under this Settlement. IF YOU DO NOTHING , you will not receive Settlement benefits, but you will be bound by the Settlement.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY September 5, 2023	You will receive no benefits, but you will retain your legal claims against the Defendant.
OBJECT BY September 5, 2023	Write to both the Settlement Administrator and the Clerk of Court about why you do, or do not, like the Settlement. You must remain in the Settlement Class to object to the Settlement.
GO TO A HEARING ON September 29, 2023, at 10:00 a.m. CT	Ask to speak in Court about the fairness of the Settlement.

1. What is this Notice?

This is a court-authorized Long-Form Notice of a proposed Settlement (the “Settlement”) in a Class Action lawsuit, *John, et al. v. Froedtert Health, Inc.*; Case No. 2023CV001935, pending in the Circuit Court for the County of Milwaukee, Wisconsin (the “Court”). The Settlement would resolve the Lawsuit brought on behalf of persons who allege that their information may have been impacted by the data security incident where personal information of Plaintiffs and members of the Settlement Class was allegedly disclosed to Facebook as a result of Froedtert Health, Inc.’s (“Froedtert” or “Defendant”) use of the Meta Pixel on its MyChart portal between February 1, 2017, and January 22, 2020, and on its public websites between February 1, 2017, and May 23, 2022. The Court has granted Preliminary Approval of the Settlement Agreement and has conditionally certified the Settlement Class for purposes of Settlement only. This Long-Form Notice explains the nature of the class action lawsuit, the terms of the Settlement Agreement, and the legal rights and obligations of members of the Settlement Class. Please read the instructions and explanations below carefully so that you can better understand your legal rights. The Settlement Administrator in this case is Kroll Settlement Administration LLC.

2. Why did I get this Notice?

You may have received a notice because you were identified as a person whose private information may have been shared with Facebook because you accessed your MyChart Portal on Froedtert’s website between February 1, 2017, and May 23, 2022.

3. What is this lawsuit about?

The Litigation arises out of Froedtert’s implementation and use of the Meta Pixel on Froedtert’s websites, defined below as the “Website Usage Disclosure”, during which Plaintiffs allege their web usage data, containing personal health information, was shared to Facebook allegedly resulting in the invasion of Plaintiffs’ and Settlement Class Members’ privacy.

“Website Usage Disclosure” means the alleged disclosure of personal information of Plaintiffs and members of the Settlement Class to Facebook as a result of Froedtert’s use of the Meta Pixel on its MyChart portal between February 1, 2017, and January 22, 2020, and on its public websites between February 1, 2017, and May 23, 2022.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a “Class Representative” brings a single lawsuit on behalf of other people who have similar claims. All of these people together are a “Settlement Class” or “Settlement Class Members.” When a class action is settled, the Settlement, which must be approved by the Court, resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement.

5. Why is there a settlement?

To resolve this matter without the expense, delay, and uncertainties of protracted litigation, the Parties reached a settlement that resolves all claims brought on behalf of the Settlement Classes related to the data security incident. If approved by the Court, the Settlement Agreement requires Froedtert to provide cash compensation to certain Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by Froedtert and does not imply that there has been, or would be, any finding that Froedtert violated the law.

The Court already has preliminarily approved the Settlement Agreement. Nevertheless, because the settlement of a class action determines the rights of all members of the Settlement Class, the Court overseeing this lawsuit must give final approval to the Settlement Agreement before it can be effective. The Court has conditionally certified the Settlement Class for settlement purposes only, so that members of the Settlement Class may be given notice and the opportunity to exclude themselves from the Settlement Class, and to voice their support or opposition to final approval of the Settlement Agreement. If the Court does not grant final approval to the Settlement Agreement, or if it is terminated by the Parties, then the Settlement Agreement will be void, and the lawsuit will proceed as if there had been no settlement and no certification of the Settlement Class.

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

You are a member of the Settlement Class if you logged into a MyChart patient portal account maintained by Froedtert at least once between February 1, 2017, and May 23, 2022 (“Settlement Class”).

YOUR BENEFITS UNDER THE SETTLEMENT

7. What can I get from the Settlement?

Settlement Class Members who file a valid Claim Form may receive monetary compensation of an equal share of the Net Settlement Fund. The Net Settlement Fund is the funds that remain for the \$2,000,000 Settlement Fund following the payment of Notice and Claims Administration Costs, Class Representative Service Awards, and Attorneys’ Fees, Costs and Expenses Award.

*****To receive Settlement benefits, you must submit a Claim Form.**

8. When will I receive the benefits?

If you timely submit a valid Claim Form for monetary recovery, you will receive payment in the amount approved by the Settlement Administrator after processing your Claim Form, and the Settlement is Final and has become effective.

QUESTIONS? VISIT WWW.FHPIXELSETTLEMENT.COM

9. I want to be a part of the Settlement. What do I do?

To submit a claim for cash compensation, you must timely submit the Claim Form on the Settlement Website at www.FHpixelsettlement.com, or by mail to John et al. v. Froedtert Health, Inc., c/o Kroll Settlement Administration LLC, PO Box 5324, New York, NY 10150-5324.

You must submit any claims by October 5, 2023. There can be only one valid and timely claim per Settlement Class Member.

10. What am I giving up if I remain in the Settlement?

By staying in the Settlement Class, all the Court's orders will apply to you and will bind you, and you give Defendant a "release." A release means you cannot sue or be part of any other lawsuit or other legal action against Defendant about or arising from the claims or issues in this lawsuit with respect to the alleged sharing of your information stored in Defendant's system prior to May 23, 2022.

The precise terms of the release are in the Settlement Agreement, which is available on the Settlement Website. Unless you formally exclude yourself from this Settlement, you will release your claims.

If you have any questions, you can talk for free to the attorneys identified below who have been appointed by the Court to represent the Settlement Class, or you are welcome to talk to any other lawyer of your choosing at your own expense.

11. How much will the Class Representative receive?

The Class Representatives will seek a payment of \$3,500 each to Keefe John and Jillian Catherine Klug for their services to the Settlement Class. This payment is subject to the Court's Approval and will be paid from the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the Settlement, but you want to keep your legal claims against Defendant, then you must take steps to exclude yourself from this Settlement.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail stating that you want to be excluded from *John, et al. v. Froedtert Health, Inc.*; Case No. 2023CV001935 (Milwaukee, Wisconsin) to the Settlement Administrator. Such notice shall state: (1) your full name and address; (2) the case name and docket number; (3) a written statement that you wish to be excluded from the Settlement; and (4) your signature. You must mail your exclusion request so that it is postmarked **no later than September 5, 2023**, to:

John et al. v. Froedtert Health, Inc.
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

QUESTIONS? VISIT WWW.FHPIXELSETTLEMENT.COM

13. If I exclude myself, do I still receive benefits from this Settlement?

No, if you submit an opt-out notice, you will not receive anything resulting from the Settlement, but you may sue Defendant over the claims raised in this case, either on your own or as a part of a different lawsuit. If you exclude yourself, the time you have in which to file your own lawsuit (called the “statute of limitations”) will begin to run again. You will have the same amount of time to file the suit that you had when this case was filed. If you file an objection, you may still receive benefits if you timely file a claim.

THE LAWYERS REPRESENTING THE CLASS

14. Do I have a lawyer in this case?

The Court has appointed three attorneys to represent the Settlement Class as Class Counsel:

Gary M. Klinger
**Milberg Coleman Bryson
Phillips Grossman, PLLS**
227 W. Monroe Street, Suite 2100
Chicago, IL 60606
Phone: (866) 252-0878
Fax: (865) 522-0049
gklinger@milberg.com

David K. Lietz
**Milberg Coleman Bryson
Phillips Grossman, PLLS**
5335 Wisconsin Avenue NW
Suite 440 Washington, D.C. 20015
Phone: (866) 252-0878
dlietz@milberg.com

David S. Almeida
Almeida Law Group LLC
849 W. Webster Avenue
Chicago, Illinois 60614
Phone: 312-576-3024
david@almeidalawgroup.com

These attorneys will be paid using funds from the Settlement Fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel will request to be paid reasonable attorneys' fees up to 35% of the Settlement Fund plus their expenses incurred in the Litigation, subject to Court approval. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed.

OBJECTING TO THE SETTLEMENT

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

You can tell the Court that you do not agree with the Settlement or some part of it. If you are a Settlement Class Member, you can object to the Settlement and the Court will consider your views. In order to object to the Settlement, you must provide a written objection (such as a letter or legal brief) stating that you object and the reasons why you think the Court should not approve the Settlement. Your objection should include: (1) the objector's full name, telephone number, email address and address; (2) proof of being a member of the Settlement Class; (3) the case name and docket number, *John, et al. v. Froedtert Health, Inc.*; Case No. 2023CV001935; (4) all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials; (5) the identification of any other objections he/she has filed, or has had filed on his/her behalf, in any other class action cases in the last four years; (6) whether the objector intends to appear at the Final Approval Hearing, and (7) the objector's signature.

If represented by counsel, the objecting Settlement Class Member must also provide the name and telephone number of his/her counsel. If the objecting Settlement Class Member intends to appear at the Final Approval Hearing, either with or without counsel, he/she must state as such in the written objection, and must also identify any witnesses he/she may call to testify at the Final Approval Hearing and all exhibits he/she intends to introduce into evidence at the Final Approval Hearing, which must also be attached to, or included with, the written objection.

To be timely, written notice of an objection in the appropriate form must be filed with the Court no later than the Objection Deadline, and served on Class Counsel and Defendant's Counsel as noted below:

Milwaukee County Courts
901 North 9th Street
Milwaukee, Wisconsin 53233

Gary M. Klinger
Milberg Coleman Bryson Phillips Grossman
227 W. Monroe Street, Suite 2100
Chicago, Illinois 60606
Tel: 866.252.0878

QUESTIONS? VISIT WWW.FHPIXELSETTLEMENT.COM

David S. Almeida
Almeida Law Group LLC
849 W. Webster Avenue
Chicago, Illinois 60614
Tel: 312.576.3024

Paul Karlsgodt
Baker & Hostetler LLP
1801 California Street, Ste. 4400
Denver, CO 80202

THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to grant final approval of the Settlement. You may attend if you wish, but you are not required to do so.

17. Where and when is the Final Approval Hearing?

The Court has already given Preliminary Approval to the Settlement Agreement. A final hearing on the Settlement, called a Final Approval Hearing, will be held to determine the fairness of the Settlement Agreement.

The Court will hold a hearing on **September 29, 2023, at 10 a.m. CT** in the courtroom of the Honorable Pedro A. Colon, which is located at 901 North 9th Street, Milwaukee, Wisconsin 53233. The purpose of the hearing will be for the Court to determine whether the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Settlement Class and to determine the appropriate amount of compensation for Class Counsel and rule on the request for a Service Award for the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement. After the hearing, the Court will decide whether to approve the Settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THE FINAL APPROVAL HEARING TO RECIEVE BENEFITS FROM THIS SETTLEMENT. Please be aware that the hearing may be postponed to a later date without notice.

GETTING MORE INFORMATION – CONTACT:

This notice only provides a summary of the proposed Settlement. Complete details about the Settlement can be found in the Settlement Agreement available on the Settlement Website.

www.FHpixelsettlement.com

QUESTIONS? VISIT WWW.FHPIXELSETTLEMENT.COM

If you have any questions, you can contact the Settlement Administrator or Class Counsel at the numbers or email addresses set forth above. In addition to the documents available on the Settlement Website, all pleadings and documents filed in this lawsuit may be reviewed or copied at the Clerk of Court's office.

DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO THE CLERK OF THE COURT OR TO THE JUDGE.

They are not permitted to answer your questions.

All questions about the Settlement shall be referred to the Settlement Administrator and/or Class Counsel.