

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Doe v. Southern Mono Healthcare District*

Case No. 23UCM78

Superior Court of California, Mono County

**IF YOU USED MAMMOTH HOSPITAL'S "YOUR MEDICAL RECORD" PORTAL FROM AUGUST 9, 2020, THROUGH AUGUST 9, 2023, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with the Southern Mono Healthcare District d/b/a Mammoth Hospital ("Mammoth" or "Defendant") in a class action lawsuit. This lawsuit concerned Mammoth's use of third-party tracking technologies, called "tracking pixels," on its web pages. Plaintiff claims that using tracking pixels violated certain California privacy laws.
- The lawsuit is captioned *Doe v. Southern Mono Healthcare District*, Case No. 23UCM78, pending in the Superior Court of California for Mono County (the "Action").
- Mammoth denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the litigation.
- Mammoth's records indicate that you are a Class Member, and entitled to benefits under the Settlement.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
<b>SUBMIT A CLAIM</b>	<p>The only way to receive benefits from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.MammothHospitalPixelSettlement.com">www.MammothHospitalPixelSettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p>	<b>October 14, 2025</b>
<b>OPT OUT OF THE SETTLEMENT</b>	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	<b>September 15, 2025</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	<b>September 15, 2025</b>
<b>DO NOTHING</b>	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

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## Basic Information

### 1. Why was this Notice issued?

The Superior Court of California for Mono County authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is captioned *Doe v. Southern Mono Healthcare District*, Case No. 23UCM78, pending in the Superior Court of California for Mono County. The person that filed this lawsuit is called the “Plaintiffs” (or “Class Representatives”) and the entity they sued, Southern Mono Healthcare District d/b/a Mammoth Hospital, is called the “Defendant.”

### 2. What is this lawsuit about?

This lawsuit alleges that Mammoth used third-party tracking technologies, called “tracking pixels,” on its website in a way that violates certain California privacy laws.

### 3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representatives is an individual (Jane Doe) whose name is under court seal, and everyone included in this Action are the Class Members

## 4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant is right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. Plaintiff and her attorneys think the Settlement is best for all Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class this way: “Mammoth patients who have used the Mammoth Web Properties to access Mammoth’s ‘Your Medical Record’ located at <https://mammothhospital.org> between August 9, 2020, through August 9, 2023.” Mammoth’s records indicate that you are a Class Member.

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s family and staff, (2) Mammoth and its officers and directors, and (3) anyone who validly excludes themselves from the Settlement.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@MammothHospitalPixelSettlement.com](mailto:info@MammothHospitalPixelSettlement.com)
- Call toll free, 24/7: **1-833-360-6895**
- By mail: **Mammoth Hospital Pixel Settlement, c/o Settlement Administrator, PO Box 25226, Santa Ana, CA 92799**

You may also view the Settlement Agreement at [www.MammothHospitalPixelSettlement.com](http://www.MammothHospitalPixelSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

Mammoth has agreed to pay for two benefits that are available to all Class Members.

You may file a claim for one or both of these benefits.

#### **BENEFITS**

**CyEx Privacy Shield Pro.** CyEx Privacy Shield Pro is a service that keeps your personal information safe by checking for it on the dark web. If it finds your private details there, it will alert you immediately. If fraud does occur, a dedicated case manager will help you fix the problem.

All Class Members may claim one year of this service.

**Cash Payment.** All Class Members may claim a one-time \$20.00 cash payment.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@MammothHospitalPixelSettlement.com](mailto:info@MammothHospitalPixelSettlement.com)
- Call toll free, 24/7: **1-833-360-6895**
- By mail: **Mammoth Hospital Pixel Settlement, c/o Settlement Administrator, PO Box 25226, Santa Ana, CA 92799**

## 8. What claims am I releasing if I stay in the Class?

Unless you opt out of the Settlement, you won't be able to sue, continue to sue, or be part of any other lawsuit against the Defendants about any of the legal claims this Settlement resolves. Paragraphs 25 and 26 of the Settlement Agreement describe the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.MammothHospitalPixelSettlement.com](http://www.MammothHospitalPixelSettlement.com).

## Submitting a Claim Form for a Settlement Payment

### 9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at [www.MammothHospitalPixelSettlement.com](http://www.MammothHospitalPixelSettlement.com). If you prefer, you can download the printable Claim Form from the website and mail it to the Settlement Administrator at:

**Mammoth Hospital Pixel Settlement  
c/o Settlement Administrator  
PO Box 25226, Santa Ana, CA 92799**

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, 1-833-360-6895, by email [info@MammothHospitalPixelSettlement.com](mailto:info@MammothHospitalPixelSettlement.com), or by U.S. mail at the address above.

### 10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **October 14, 2025**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than **October 14, 2025**.

### 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 6, 2025 (see Question 18)**. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments and the link to sign up for CyEx will be distributed if the Court grants final approval, and after any appeals are resolved.

## The Lawyers Representing You

### 12. Do I have a lawyer in the case?

Yes, the Court appointed attorneys Raina C. Borrelli of Strauss Borrelli PLLC and Foster Johnson of Ahmad, Zavitsanos & Mensing, to represent you and other Class Members (“Class Counsel”).

### 13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

### 14. How will Class Counsel be paid?

Class Counsel will ask the court to approve attorneys’ fees, costs, and expenses of \$380,000.00, which will be paid directly by Mammoth.

Class Counsel will also ask for Service Award of \$2,500.00 for the Class Representatives. Service Awards will also be paid directly by Mammoth.

## Excluding Yourself from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive a Settlement payment, but you will keep any rights you may have to sue Mammoth on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **September 15, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Action: *Doe v. Southern Mono Healthcare District*, Case No. 23UCM78, pending in the Superior Court of California for Mono County;
- (2) your full name, mailing address, and telephone number;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

**Mammoth Hospital Pixel Settlement  
ATTN: Exclusion Request**

PO Box 25226, Santa Ana, CA 92799

Your Request for Exclusion must be submitted, postmarked, or emailed by **September 15, 2025**.

## **Commenting on or Objecting to the Settlement**

### **16. How do I tell the Court if I like or do not like the Settlement?**

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Action: *Doe v. Southern Mono Healthcare District*, Case No. 23UCM78, pending in the Superior Court of California for Mono County;
- (2) your full name, mailing address, telephone number, and email address;
- (3) information that proves that you as a Class Member (such as a settlement notice, or your attestation that you are a Class Member);
- (4) a statement that you object to some or all of the Settlement;
- (5) a clear description of all the reasons you object; include any legal support you may have for your objection;
- (6) copies of any documents that you want to submit to support your objection;
- (7) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their contact information and state that you have authorized that attorney to represent you in this case;
- (8) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (9) if either your or your attorney have objected to a class action in the past 3 years, please provide a list of those cases, including case names, court information, and docket number;
- (10) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **September 15, 2025**. You must also send copies of the objection to Class Counsel and both counsel for Defendants.

<b>Clerk of the Court</b>	<b>Class Counsel</b>	<b>Counsel for Defendants</b>
Clerk of the Court 100 Thompson Way, Mammoth Lakes, CA 93546	Raina C. Borrelli <b>STRAUSS BORRELLI PLLC</b> 980 Michigan Ave. N. Suite 1610 Chicago, IL 60611	Rachel A. Straus <b>SHOOK, HARDY &amp; BACON LLP</b> 2121 Avenue of the Stars Suite 1400 Los Angeles, CA 90067

### 17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## The Court's Final Approval Hearing

### 18. When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **November 6, 2025 at 9:30 a.m. Pacific Time** in the Superior Court of California for Mono County, at **100 Thompson Way, Mammoth Lakes, CA 93546**.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award a Service Award to the Class Representative who brought this Action on behalf of the Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check **[www.MammothHospitalPixelSettlement.com](http://www.MammothHospitalPixelSettlement.com)** for updates.

### 19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### 20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## Getting More Information

### 21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, **[www.MammothHospitalPixelSettlement.com](http://www.MammothHospitalPixelSettlement.com)**.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: **[info@MammothHospitalPixelSettlement.com](mailto:info@MammothHospitalPixelSettlement.com)**



- Call toll free, 24/7: **1-833-360-6895**
- By mail: **Mammoth Hospital Pixel Settlement, c/o Settlement Administrator, PO Box 25226, Santa Ana, CA 92799**

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 100 Thompson Way, Mammoth Lakes, CA 93546.

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**