

**CIRCUIT COURT FOR THE 17TH JUDICIAL CIRCUIT FOR BROWARD COUNTY, FLORIDA**

*Ramirez v. Forbes Media, LLC, Case No. CACE-25-011695.*

**Our Records Indicate You Were A Forbes Online or Mobile Application Account Holder And/Or Newsletter Subscriber and May Be Entitled to a Payment From a Class Action Settlement.**

**NOTE: You will not qualify as a Class Member if you did not have an active Facebook account at the same time you were a Forbes U.S. online or mobile application account holder and/or newsletter subscriber. Additionally you will not qualify as a Class Member if you did not access or view a video on forbes.com from July 25, 2020 through December 1, 2022 from the same device and browser as you had accessed Facebook .**

*A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.*

- A settlement has been reached in a class action lawsuit claiming that Defendant, Forbes Media, LLC, disclosed its subscribers' personally identifiable information ("PII") to Facebook via the Facebook Tracking Pixel without consent in violation of the Video Privacy Protection Act (the "VPPA"). The VPPA defines PII to include information which identifies a person as having requested or obtained specific video materials or services from a video tape service provider. Defendant denies that it violated any law and denies that it disclosed any PII of its subscribers to Facebook but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing defending the case.
- You are included if you are or were a Forbes online or mobile application account holder and/or Forbes newsletter subscriber who had a Facebook account, in the United States, and who accessed a video through forbes.com from the same device and browser where you accessed Facebook from July 25, 2020 through December 1, 2022.
- Persons included in the Settlement will be eligible to submit a Claim Form to receive a cash payment of up to \$15.
- Read this notice carefully. Your legal rights are affected whether you act, or don't act.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM BY NOVEMBER 4, 2025</b>	This is the <b>only</b> way to receive a payment.
<b>EXCLUDE YOURSELF BY OCTOBER 21, 2025</b>	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
<b>OBJECT BY OCTOBER 21, 2025</b>	Write to the Court explaining why you don't like the Settlement.
<b>GO TO THE HEARING ON NOVEMBER 17, 2025</b>	Ask to speak in Court about your opinion of the Settlement.

<b>DO NOTHING</b>	You <b>will not</b> get a share of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this case.
-------------------	---

Your rights and options—and the deadlines to exercise them—are explained in this notice.

## **BASIC INFORMATION**

### **1. Why was this notice issued?**

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

The Honorable Judge Michele Towbin Singer of the Circuit Court for the 17th Judicial Circuit for Broward County, Florida, is overseeing this case. The case is called *Ramirez v. Forbes Media, LLC*, Case No. CACE-25-011695. The people who sued are called the Plaintiffs. The Defendant is Forbes Media, LLC.

### **2. What is a class action?**

In a class action, one or more people called the class representatives (in this case, David Ramirez, Amber Stouffe, and Joseph Lamb) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

### **3. What is this lawsuit about?**

This lawsuit claims that Defendant violated the Video Privacy Protection Act, 18 U.S.C. § 2710, *et seq.* (“VPPA”) by disclosing its subscribers’ personally identifiable information (“PII”) to Facebook via the Facebook Tracking Pixel without consent. The VPPA defines PII to include information which identifies a person as having requested or obtained specific video materials or services from a video tape service provider. The Defendant denies that it violated any law and denies that it disclosed any PII of its subscribers to Facebook. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

### **4. Why is there a Settlement?**

The Court has not decided whether the Plaintiffs or the Defendant should win this case. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Class Members will get compensation sooner rather than, if at all, after the completion of a trial.

## WHO'S INCLUDED IN THE SETTLEMENT?

### 5. How do I know if I am in the Settlement Class?

The **Settlement Class** is defined as:

All persons who during the Class Period in the United States, (i) were Forbes U.S. online account holders, mobile application account holders, or newsletter subscribers (ii) have a Facebook account, and (iii) accessed a video through Forbes' website.

**If you did not have an active Facebook account at the time you subscribed to and watched a video on Forbes.com you are not a Class Member. Additionally, if you did not access or view a video on forbes.com from July 25, 2020 through December 1, 2022 from the same device and browser as you had accessed Facebook, you are not a Class Member.**

## THE SETTLEMENT BENEFITS

### 6. What does the Settlement provide?

***Monetary Relief:*** If approved, a Settlement Fund will be created totaling up to \$7,500,000.00. Settlement Class Member cash payments, and the cost to administer the settlement, the cost to inform people about the settlement, attorneys' fees (inclusive of litigation costs), and awards to the Class Representatives will come out of this fund (*see* Question 13).

A detailed description of the settlement benefits can be found in the Settlement Agreement. [www.ForbesVPPASettlement.com](http://www.ForbesVPPASettlement.com)

### 7. How much will my payment be?

You **must** submit a Claim Form (see instructions below) to receive a share of the Settlement Fund. **If you submit a valid Claim Form, you will receive up to a \$15.00 cash payment.** This award may be subject to pro rata adjustment depending on the number of valid claims that are filed.

### 8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for on November 17, 2025, at 8:30 a.m. EST. If the Court approves the settlement, eligible Class Members whose claims were approved by the Settlement Administrator will receive their payment 70 days after the Settlement has been finally approved and/or any appeals process is complete. The payment will be made in the form of a check, unless you elect to receive payment by PayPal, Zelle, or Venmo, and all checks will expire and become void 180 days after they are issued.

## HOW TO GET BENEFITS

### **9. How do I get a payment?**

You **must** complete and submit a Claim Form to receive a payment from the Settlement Fund. You may submit a Claim Form either electronically on the Settlement Website by clicking [here](#), or by printing and mailing in a paper Claim Form, copies of which are available for download [here](#). Claim Forms must be submitted online by 11:59 p.m. EST on November 4, 2025 or postmarked and mailed by November 4, 2025.

We also encourage you to submit your claim online. Not only is it easier and more secure, but it is completely free and takes only minutes!

## **REMAINING IN THE SETTLEMENT**

### **10. What am I giving up if I stay in the Class?**

If the Settlement becomes final, you will give up your right to sue Defendant for the claims this Settlement resolve. The Settlement Agreement describes the specific claims you are giving up against the Defendant. You will be “releasing” the Defendant and certain of its affiliates described in Section 1.24 of the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are “releasing” the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the “documents” link on the website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 12 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

### **11. What happens if I do nothing at all?**

If you do nothing, you won’t get any benefits from this Settlement. But, unless you exclude yourself, you won’t be able to start a lawsuit or be part of any other lawsuit against the Defendant for the claims being resolved by this Settlement.

## **THE LAWYERS REPRESENTING YOU**

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

The Court has appointed lawyers Philip L. Fraietta and Alec M. Leslie of Bursor & Fisher, P.A. and Gary M. Klinger and Alex Honeycutt of Milberg Coleman Bryson Phillips Grossman PLLC to represent the class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be

charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

### **13. How will the lawyers be paid?**

Class Counsel's attorneys' fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the Court. Class Counsel is entitled to seek no more than one-third of the \$7.5 million Settlement Fund, but the Court may award less than this amount.

As approved by the Court, the Class Representatives will be paid Service Awards from the Settlement Fund for helping to bring and settle the case. The Class Representatives may seek \$5,000 each as Service Awards, but the Court may award less than these amounts.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

### **14. How do I get out of the Settlement?**

To exclude yourself from the Settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *Ramirez v. Forbes Media, LLC* settlement, Case No. CACE-25-011695. Your letter or request for exclusion must also include your name, your address, your signature, the name and number of this case, and a statement that you wish to be excluded. You must mail or deliver your exclusion request no later than **October 21, 2025** to:

Forbes.com Privacy Settlement  
c/o Kroll Settlement Administration  
PO Box 225391  
New York, NY 10150-5391

### **15. If I don't exclude myself, can I sue the Defendant for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement.

### **16. If I exclude myself, can I get anything from this Settlement?**

No. If you exclude yourself, do not submit a Claim Form to ask for benefits.

## **OBJECTING TO THE SETTLEMENT**

### **17. How do I object to the Settlement?**

If you're a Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file with the Court a letter or brief

stating that you object to the Settlement in *Ramirez v. Forbes Media, LLC*, Case No. CACE-25-011695 and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, an explanation of the basis upon which you claim to be a Settlement Class Member, including information sufficient to identify your Forbes.com account and Facebook page or a screenshot showing that you were a Forbes.com and Facebook member during the class period, the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Defendant's Counsel listed below.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by October 18, 2025.

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 21), you must say so in your letter or brief. File the objection with the Court and mail a copy to these two different places postmarked no later than **October 21, 2025**.

<b>Court</b>	<b>Class Counsel</b>	<b>Defendant's Counsel</b>
The Honorable Michele Towbin Singer Broward County Courthouse, 201 SE 6th Street, Fort Lauderdale, FL 33301	Philip L. Fraietta Bursor & Fisher PA 1330 Avenue of the Americas, 32nd Floor New York, NY 10019	Mark S. Melodia Holland & Knight LLP 787 Seventh Avenue, 31st Floor New York, NY 10019

#### **18. What's the difference between objecting and excluding myself from the Settlement?**

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself from the Class is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

### **THE COURT'S FINAL APPROVAL HEARING**

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

The Court will hold the Final Approval Hearing on November 17, 2025, at 8:30 a.m. EST, the parties will appear via Zoom for the Final Approval Hearing. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for service awards to the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check [www.ForbesVPPAsettlement.com](http://www.ForbesVPPAsettlement.com) or call (646) 837-7150 or (833) 621-7730. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of such Final Approval Hearing.

The Zoom information is as follows:

Meeting: <https://zoom.us/j/91926028850>

Meeting ID: 919 2602 8850

#### **20. Do I have to come to the hearing?**

No. Class Counsel will answer any questions the Court may have, but you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

#### **21. May I speak at the hearing?**

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include in your letter or brief objecting to the Settlement a statement saying that it is your "Notice of Intent to Appear in *Ramirez v. Forbes Media, LLC*, Case No. CACE-25-011695." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than **October 21, 2025**, and be sent to the addresses listed in Question 17.

### **GETTING MORE INFORMATION**

#### **22. Where do I get more information?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at [www.ForbesVPPAsettlement.com](http://www.ForbesVPPAsettlement.com). You may also write with questions to *Forbes.com Privacy Settlement*, c/o Kroll Settlement Administration, PO Box 225391, New York,

NY 10150-5391. You can call the Settlement Administrator at (833) 621-7730 or Class Counsel at (646) 837-7150, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the case website.