

**JEFFERSON COUNTY SUPERIOR COURT
NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Jane Doe et al. v. Jefferson County Public Hospital District No. 2 D/B/A Jefferson Healthcare
Jefferson County Case No. 24-2-00070-15

If You Are a Jefferson Healthcare Patient and Accessed Jefferson Healthcare’s Website Between March 19, 2020, and March 19, 2024 You May Be Entitled to a Voucher from a Class Action Settlement.

A court has 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.

A settlement has been reached in a class action lawsuit claiming that Defendant, Jefferson County Public Hospital District No.2 D/B/A Jefferson Healthcare, allegedly implemented and used Meta Pixel and/or similar tracking technologies on its website, as a result of which Plaintiff alleges a Website Usage Disclosure. Defendant denies all of Plaintiff’s claims in the lawsuit and maintains that they did nothing wrong, but have agreed to the settlement to avoid expense, burden and uncertainties associated with continuing the case.

You are a Settlement Class Member if you were a patient of Jefferson Healthcare between March 19, 2020 and March 19, 2024, and visited the Jefferson Healthcare website (<http://jeffersonhealthcare.org>) between March 19, 2020 and March 19, 2024, and the visit to the Jefferson Healthcare website was for purposes related to the provision of your own healthcare.

Persons included in the Settlement will be eligible to submit a Settlement Claim Form to receive a voucher for a twelve (12)-month subscription for the CyEx Privacy Shield product. The CyEx Privacy Shield product features include Data Broker Opt Out, VPN in Touch, Digital Vault, Password Defense, Dark Web Watchlist, Password Scan, and Private Search. Additionally, Defendant is not currently using the Meta Pixel on their website, jeffersonhealthcare.org. Defendant agrees that for the next two years Defendant will not use the Meta Pixel on their Website, unless it is determined that its use is consistent with applicable law at the time and Defendant makes an affirmative disclosure in the Privacy Statement on Defendant’s website that the Meta Pixel is being used on the website.

QUESTIONS? WWW.JCPHDPIXELSETTLEMENT.COM

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A SETTLEMENT CLAIM FORM BY NOVEMBER 17, 2025	This is the only way to receive a voucher.
EXCLUDE YOURSELF BY OCTOBER 17, 2025	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT BY OCTOBER 17, 2025	Write to the Court explaining why you don't like the Settlement.
GO TO THE HEARING ON DECEMBER 5, 2025	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You will not get a share of the Settlement benefits and will give up your rights to sue the Defendants about the claims in this case.

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

BASIC INFORMATION

1. What is this Notice?

This is a Court-authorized Notice of a proposed settlement of a class action, *Jane Doe et al. v. Jefferson County Public Hospital District No.2 D/B/A Jefferson Healthcare*, Case No. 24-2-00070-15, filed in Superior Court of Washington, County of Jefferson. The person who sued is called a “Plaintiff” or “Class Representative” and the company she sued, Jefferson County Public Hospital District No.2 D/B/A Jefferson Healthcare, is known as the “Defendant” in this case.

The Court has certified the **Settlement Class (defined below in Response #6)** and has granted preliminary approval of the Settlement Agreement. This Notice explains the nature of the class action lawsuit, the terms of the Settlement Agreement, and the legal rights and obligations of Settlement Class Members. Please read the instructions and explanations below carefully so that you can better understand your legal rights.

2. Why did I receive a Notice?

You may have received a Notice because you were identified as an individual who was a patient of Defendant Jefferson Healthcare between March 19, 2020 and March 19, 2024.

3. What is this lawsuit about?

Plaintiff alleges that Defendant installed computer code on its website, www.jeffersonhealthcare.org, that caused protected health information to be disclosed to third parties, including Facebook and Google. Defendant denies any wrongdoing whatsoever.

QUESTIONS? WWW.JCPHDPIXELSETTLEMENT.COM

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 the uncertainties of protracted litigation, the Parties reached a settlement that resolves all claims brought on behalf of the Settlement Class. If finally approved by the Court, the Settlement Agreement requires Defendants to provide a voucher to Settlement Class Members who submit valid and timely Settlement Claim Forms. The settlement is not an admission of wrongdoing by Defendants.

The Court overseeing this Litigation must give final approval to the Settlement Agreement before it can become effective. The Court has preliminarily approved the Settlement Agreement so that Settlement Class Members may be given notice and the opportunity to exclude themselves from the Settlement Class or to voice their support for or opposition to final approval of the Settlement Agreement. If the Court does not finally approve the Settlement Agreement, or if it is terminated by the Parties, then the Settlement Agreement will be void, and the Litigation will proceed as if there had been no settlement.

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

You are a Settlement Class Member if you were a patient of Jefferson Healthcare between March 19, 2020 and March 19, 2024, and visited the Jefferson Healthcare website (<http://jeffersonhealthcare.org>) between March 19, 2020, and March 19, 2024, and the visit to the Jefferson Healthcare website was for purposes related to the provision of your own healthcare. Excluded from the Settlement Class are: (1) all persons who timely and validly request exclusion from the Settlement Class; (2) the Judge assigned to evaluate the fairness of this settlement and the Judge’s staff and immediate family members (3) officers and directors of Jefferson Healthcare and (4) the legal representatives, successors or assigns of any such excluded person.

YOUR BENEFITS UNDER THE SETTLEMENT

7. What can I get from the Settlement?

The complete terms of the settlement are found in the Settlement Agreement, which is available on the Documents section of the Settlement Website, www.JCPHDpixelsettlement.com. This Notice only provides a summary.

Settlement Relief: Defendants have agreed to purchase each Settlement Class Member a voucher for a twelve (12)-month subscription for the CyEx Privacy Shield product. The CyEx Privacy Shield product features include Data Broker Opt Out, VPN in Touch, Digital Vault, Password Defense, Dark Web Watchlist, Password Scan, and Private Search.

Prospective Relief: For two years following final approval of the settlement, Jefferson Healthcare agrees not to use Meta Pixel on its Jefferson Healthcare website, unless it is determined that its use is consistent with applicable law at the time and Defendant makes an affirmative disclosure in the Privacy Statement on Defendant’s website that the Meta Pixel is being used on the website.

8. How do I get a voucher?

Complete a Settlement Claim Form by November 17, 2025. This is the only way to get a voucher from the settlement. Once completed, the Settlement Claim Form can be submitted electronically on the settlement website, www.JCPHDpixelsettlement.com, or printed and mailed to the following address:

Jefferson Healthcare Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Mailed Settlement Claim Forms must be postmarked by November 17, 2025. Each Settlement Class member is entitled to submit only one Settlement Claim Form. If you submit a Settlement Claim Form through the settlement website, please do not submit a duplicate claim form by mail, and vice versa. Duplicate claim forms will be rejected.

9. When will I receive the benefits?

If you timely submit a valid Settlement Claim Form for a voucher and the settlement is finally approved, you will receive a voucher after the Settlement Administrator processes your Settlement Claim Form. You will receive any voucher after the settlement is final and has become effective.

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. You also give Defendant a “release,” which 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. The precise terms of the release are in the Settlement Agreement, which is available in the Documents section of 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. What happens if I do nothing at all?

By doing nothing you are staying in the Settlement Class but you are giving up the ability to get a voucher from the settlement. To get a payment you must submit a Settlement Claim Form by November 17, 2025. By doing nothing or submitting a Settlement Claim Form, you are choosing to stay in the Settlement Class and, if the settlement becomes final, you give up any right to sue the Defendants separately about the same issues in this lawsuit. See Response #10.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the settlement, but you want to preserve your legal claims against Defendants, 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 an opt-out request by mail stating that you want to be excluded from *Jane Doe et al. v. Jefferson County Public Hospital District No.2 D/B/A Jefferson Healthcare*, Case No. 24-2-00070-15, to the Settlement Administrator. Your opt-out request must include: (1) your full name and address; (2) the case name and docket number (*Jane Doe et al. v. Jefferson County Public Hospital District No.2 D/B/A Jefferson Healthcare*, Case No. 24-2-00070-15); (3) a written statement that you wish to be excluded from the settlement; and (4) your signature. You must mail your opt-out request, postmarked no later than October 17, 2025 to:

Jefferson Healthcare Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

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

No, if you submit an opt-out request you will not receive any relief benefits 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 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 (see Response #14), you may still receive benefits if you timely file a claim.

OBJECTING TO THE SETTLEMENT

14. How do I tell the Court that I do not like the settlement?

If you are a Settlement Class Member and have not excluded yourself from the settlement, you can comment on or object to the settlement, Class Counsel’s request for attorneys’ fees and

litigation expenses, and the request for a service award for the Class Representative, and the Court will consider your views. If you file an objection, you may still receive benefits so long as you timely submit a claim form.

To object to the settlement, you must file and serve 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 must:

- i. State your full name, current address, telephone number, and email address;
- ii. Include your original signature;
- iii. State the specific basis for your objection to the settlement and include copies of any documents you wish to submit in support of your objection;
- iv. Identify all lawyers representing you, if any, and provide their telephone number(s); and
- v. State whether you intend to appear at the Final Approval Hearing, with or without a lawyer.

Your objection must be filed by October 17, 2025, to be considered by the Court. To be considered, your objection must include the information listed above and be filed with Jefferson County Superior Court, located at 1820 Jefferson St., Port Townsend, WA 98368 (see <https://www.co.jefferson.wa.us/169/Superior-Court-Calendars>), no later than October 17, 2025, and served on the Settlement Administrator at the address below:

Jefferson Healthcare Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Lynn A. Toops
Cohen & Malad, LLP
One Indiana Square, Suite 1400,
Indianapolis, Indiana 46204

J. Gerard Stranch, IV
Stranch, Jennings & Garvey PLLC
223 Rosa L. Parks Avenue, Suite 200
Nashville, Tennessee 37203

Samuel J. Strauss
Strauss Borelli, PLLC,
One Magnificent Mile, 980 N Michigan Avenue, Suite 1610
Chicago, Illinois 60611

THE LAWYERS REPRESENTING THE CLASS

15. Do I have a lawyer in this case?

The Court has appointed lawyers Walter Smith of Smith & Deitrick Law Offices, PLLC; Lynn A. Toops of Cohen & Malad, LLP; J. Gerard Stranch, IV and Andrew E. Mize of Stranch, Jennings & Garvey PLLC; and Samuel J. Strauss and Raina Borelli of Turke & Strauss, LLP, to represent the class. These attorneys are called Class Counsel. 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. If you hire your own lawyer to speak for you or to appear in Court, your lawyer should file a Notice of Appearance with the Court.

16. How will the lawyers for the Settlement Class be paid?

Class Counsel will ask the Court to approve an attorneys' fee award of \$125,000.00 USD. There will be no service award for the Class Representative. Jefferson Healthcare will pay the Court-approved attorneys' fees, costs, and expenses awarded. The motion for attorneys' fees, costs, and expenses will be posted on the Settlement Website after it is filed.

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 preliminarily approved the Settlement Agreement. The Court will hold the Final Approval Hearing on December 5, 2025, at 1:00 PM PT or 4:00 PM ET in the courtroom of the Honorable Brandon Mack, which is located in the Jefferson County Courthouse at 1820 Jefferson St., Port Townsend, WA 98368. 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 the Class Representative. At that hearing, the Court may hear any objections and arguments concerning the fairness of the proposed settlement. The Court will then decide whether to approve the settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THE FINAL APPROVAL HEARING TO RECEIVE BENEFITS FROM THIS SETTLEMENT. Please be aware that the hearing may be postponed to a later date without notice. Please check www.JCPHDpixelsettlement.com for updates.

18. May I speak at the hearing?

If you are a Settlement Class Member and have not opted out of the settlement, you may ask the Court for permission to speak at the Final Approval Hearing. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

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.JCPHDpixelsettlement.com

If you have any questions or need to change your address, you can contact the Settlement Administrator online at www.JCPHDpixelsettlement.com or by mail at:

Jefferson Healthcare Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also contact Class Counsel with questions about the settlement by calling 1-866-748-6220 or by writing to:

Walter Smith
Smith & Deitrick Law Offices, PLLC
1226 State Avenue NE, Suite 205
Olympia, WA 98506

**DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR THE
LITIGATION TO THE CLERK OF COURT, THE JUDGE, OR DEFENDANT'S
COUNSEL**

QUESTIONS? WWW.JCPHDPIXELSETTLEMENT.COM