

If you are a current or past patient of Tallahassee Memorial HealthCare and had an active patient portal account between December 29, 2019, and December 31, 2024, you may be entitled to benefits from a settlement.

A Court has authorized this Notice. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit against Tallahassee Memorial HealthCare, Inc. (“Defendant” or “TMH”), over Defendant TMH’s alleged implementation and use of third-party web tracking and analytics tools on the Website <https://www.tmh.org> (the “Website”). Plaintiffs allege that TMH’s use of these tools disclosed their web usage data, containing personally identifiable information and protected health information, to Facebook, Google, and other third-parties. TMH denies all claims asserted against it and denies all allegations of wrongdoing and liability. Plaintiffs and Defendant have agreed to a Settlement to avoid the burden, expense, risk and uncertainty of continued litigation. The Court has not decided in favor of either Party.
- You are a “Settlement Class Member” if you are, or were, a patient of TMH who had an active patient portal account between December 29, 2019 and up to and including December 31, 2024.
- If you are a Settlement Class Member, you may file a Claim Form to receive:
 - **Settlement Payment.** All Settlement Class Members may file a Claim Form that will, if determined to be an Approved Claim, entitle them to a Settlement Payment of \$17.00; and/or
 - **CyEx Financial Shield Complete.** All Settlement Class Members may also elect to receive, if determined to be an Approved Claim, twenty-four (24) months of CyEx Financial Shield Complete. Selection of CyEx Financial Shield Complete is not a condition to receive a Settlement Payment.

This Long-Form Notice explains your rights and options. Please read it carefully.

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

Your Legal Rights and Options		Deadline
SUBMIT A CLAIM FORM	You must submit a Claim Form by mail or online to receive Settlement benefits.	February 9, 2026
EXCLUDE YOURSELF	Get no Settlement benefits. Keep your right to file your own lawsuit against the Defendant and Released Parties about the legal claims in this case.	January 9, 2026
OBJECT	Tell the Court why you do not like the Settlement. You will still be bound by the Settlement if the Court approves it.	January 9, 2026
DO NOTHING	Get no Settlement benefits. Be bound by the Settlement.	

- The Court in charge of this case must still decide whether to grant final approval of the Settlement and the requested Attorneys’ Fees, Costs and Expenses Award and Service Awards. No Settlement benefits or payments will be provided unless the Court approves the Settlement, and it becomes Final.

Questions? Go to www.TallahasseePixelSettlement.com or call (833) 417-4926

BASIC INFORMATION

1. Why is this Long-Form Notice being provided?

A Court authorized this Long-Form Notice because you have the right to know about the proposed Settlement of a class action lawsuit and about your rights and options before the Court decides whether to grant final approval of the Settlement. This Long-Form Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to get them.

Judge John Cooper of the Second Judicial District in and for Leon County, Florida is overseeing this class action lawsuit. The case is known as *D.S. and E.I. v. Tallahassee Memorial HealthCare*, Case No. 2025 CA 001009. The people who filed this lawsuit are called the “Plaintiffs” and the company sued is the Defendant, TMH.

2. What is this lawsuit about?

The lawsuit arises out of TMH’s alleged implementation and use of third-party web tracking and analytics tools on the Website. Plaintiffs allege that TMH’s use of these tools disclosed their web usage data, containing personally identifiable information and protected health information, to Facebook, Google, and other third-parties. Plaintiffs’ Complaint can be viewed at www.TallahasseePixelSettlement.com.

Defendant denies all claims asserted against it in the lawsuit, denies all allegations of wrongdoing and liability, and denies all material allegations of the Complaint.

3. Why is the lawsuit a class action?

In a class action, the “Class Representatives” or “Plaintiffs” sue on behalf of all people who have similar legal claims. In the event of a settlement, such as here, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those persons who timely and validly exclude themselves from the Settlement Class.

The Class Representatives in this case are Delilah Stewart and Elijah Ible.

4. Why is there a Settlement?

Plaintiffs and Defendant do not agree regarding the legal claims made in this lawsuit. Plaintiffs and Class Counsel believe that the legal claims asserted in this lawsuit have merit; Defendant vigorously denies all claims asserted against it in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of Plaintiffs or Defendant. Instead, Plaintiffs and Defendant have agreed to settle the lawsuit. Plaintiffs and the lawyers for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members due to the risks and uncertainty associated with continuing the lawsuit.

WHO IS INCLUDED IN THE SETTLEMENT?

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

Under the Settlement, the Court decided that the Settlement Class includes all U.S. persons who are, or have been, patients of Defendant who had an active patient portal account between December 29, 2019, and up to and including December 31, 2024.

Questions? Go to www.TallahasseePixelSettlement.com or call (833) 417-4926

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are (i) TMH, any entity in which TMH has a controlling interest, and TMH's affiliates, parents, subsidiaries, officers, directors, legal representatives, successors, and assigns; (ii) any judge, justice, or judicial officer presiding over the lawsuit and the members of their immediate families and judicial staff; and (iii) any individual who timely and validly excludes themselves from the Settlement.

7. What is the "Website Usage Disclosure?"

"Website Usage Disclosure" means the alleged disclosure of personal information of Plaintiffs and Settlement Class Members to Facebook, Google, or other third-parties via web tracking or analytics tools allegedly used on the Website. Defendant denies it has disclosed any personal information of Plaintiffs and Settlement Class Members.

8. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.TallahasseePixelSettlement.com for additional information.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

9. What does the Settlement provide?

Under the Settlement, Defendant has agreed to pay for: (i) reasonable Notice and Claims Administration Costs incurred pursuant to the Settlement Agreement, (ii) any Service Awards approved by the Court, (iii) any Attorneys' Fees, Costs, and Expenses Award as approved by the Court, and (iv) any benefits to Settlement Class Members, pursuant to the terms and conditions of the Settlement Agreement.

If you are a Settlement Class Member, and you file a valid and timely Claim Form by **February 9, 2026**, you may be eligible for the following Settlement benefits:

- **Settlement Payment.** All Settlement Class Members may file a Claim Form that will, if determined to be an Approved Claim, entitle them to a Settlement Payment of \$17.00, via either a Check Payment or an Electronic Payment; and/or
- **CyEx Financial Shield Complete.** All Settlement Class Members may also elect to receive, if determined to be an Approved Claim, twenty-four (24) months of CyEx Financial Shield Complete. Selection of CyEx Financial Shield Complete is not a condition to receipt of a Settlement Payment.

10. What am I giving up to receive Settlement benefits or stay in the Settlement Class?

Unless you exclude yourself, you are choosing to remain in the Settlement Class. If the Settlement is approved and becomes Final, the Court's orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called "Released Class Claims."

11. What are the Released Class Claims?

The Settlement Agreement in Section XV describes the Release, Released Class Claims, and the Released Parties, so please read this section carefully. The Settlement Agreement is available at www.TallahasseePixelSettlement.com or in the public court records on file in this lawsuit. For questions regarding the Release and what it means, you can also contact one of the lawyers listed in Question 15 for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

12. How do I make a claim for Settlement benefits?

To receive Settlement benefits, you must file a valid Claim Form. Your Claim Form must be complete and submitted to the Settlement Administrator, submitted online or mailed and **postmarked** on or before **February 9, 2026**. Claim Forms may be submitted online at www.TallahasseePixelSettlement.com or printed from the website and mailed to the Settlement Administrator at the address on the form. The quickest way to submit a Claim Form is online. Claim Forms are also available by writing to:

TMH Pixel Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

13. What happens if my contact information changes after I submit a claim?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Settlement Administrator of your updated information. You may notify the Settlement Administrator of any changes by calling (833) 417-4926 or by writing to:

TMH Pixel Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

14. When will I receive my Settlement benefits?

If you file a valid Claim Form, you will receive information via email regarding how to activate your Privacy Shield benefits, and your Settlement Payment will be provided by the Settlement Administrator, after the Settlement is approved by the Court and becomes Final.

It may take time for the Settlement to be approved and become Final. Please be patient and check www.TallahasseePixelSettlement.com for updates.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

Yes, the Court has appointed the law firms of Milberg Coleman Bryson Phillips Grossman, PLLC and Markovits, Stock & DeMarco, LLC as Class Counsel to represent you and the Settlement Class for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this lawsuit.

Questions? Go to www.TallahasseePixelSettlement.com or call (833) 417-4926

16. How will Class Counsel be paid?

Class Counsel will file a motion asking the Court for a reasonable Attorneys' Fees, Costs, and Expenses Award not to exceed four-hundred and ten thousand dollars (\$410,000), which includes reasonable litigation expenses.

Class Counsel will also ask the Court to approve a Service Award of \$3,000 to each Class Representative, for participating in this lawsuit and for their efforts in achieving the Settlement. The Court may award less than the amounts requested by Class Counsel.

Class Counsel's application for a reasonable Attorneys' Fees, Costs and Expenses Award and the Service Awards will be made available on the Settlement Website at www.TallahasseePixelSettlement.com before the deadline for you to comment or object to the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you are a Settlement Class Member and you want to keep any right you may have to sue or continue to sue Defendant and Released Parties on your own based on the legal claims raised in this lawsuit or released by the Released Class Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement.

17. How do I get out of the Settlement?

You may request to be excluded from the Settlement Class in writing by sending a letter to the Settlement Administrator. Your request must be **postmarked** on or before **January 9, 2026**. Your request must include the following:

- The case name and number of the lawsuit [*D.S. and E.I. v. Tallahassee Memorial HealthCare.*, Case No. 2025 CA 001009]
- Your full name, address, and telephone number;
- A statement that you wish to be excluded from the Settlement Class;
- A statement as to whether you were a patient of TMH and had an active patient portal account between December 29, 2019, and up to and including December 31, 2024.and
- Your personal and original signature.

You may only request exclusion for yourself. “Mass Opt-Outs” requesting exclusion of more than one Settlement Class Member will be deemed invalid by the Settlement Administrator.

A written notice to be excluded that is sent to an address other than designated below, or that is not postmarked within the time specified, will be invalid and the person making the request will be considered a member of the Settlement Class and will be bound as a Settlement Class Member by the Settlement Agreement, if approved.

Your notice to be excluded must be **postmarked** and sent to the Settlement Administrator at the following address by **January 9, 2026**:

TMH Pixel Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

18. If I exclude myself, can I still get anything from this Settlement?

No. If you exclude yourself, you are telling the Court you do not want to be part of the Settlement. You can get benefits from the Settlement only if you stay in the Settlement and submit a valid Claim Form.

19. If I do not exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant and Released Parties for the claims resolved by this Settlement. You must exclude yourself from this lawsuit to start or continue your own lawsuit or to be part of any other lawsuit against the Defendant or any of the Released Parties. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECT TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can tell the Court you do not agree with all or any part of the Settlement or the requested Attorneys' Fees, Costs and Expenses Award or Service Awards. You can also give reasons why you think the Court should not approve the Settlement or the Attorneys' Fees, Costs and Expenses Award or Service Awards.

To object, you must file a timely written notice of your Objection, so it is **filed by January 9, 2026**. Such notice must:

- Include the case name and number of the lawsuit [*D.S. and E.I. v. Tallahassee Memorial HealthCare.*, Case No. 2025 CA 001009]
- Include your full name, current address, telephone number, and email address;
- Include your personal and original signature;
- Contain proof that you are a Settlement Class Member, including an attestation under the laws of the United States that you are, or have been, a patient of Defendant and had an active patient portal account between December 29, 2019, and up to and including December 31, 2024;
- State that you object to the Settlement, in whole or in part;
- Set forth a statement of the legal and factual basis for your Objection;
- Provide copies of any documents that you wish to submit in support of your position;
- Identify any counsel representing you with respect to, or who provided assistance to you in drafting, your Objection (and include the signature, name, address, telephone number, and email address of your counsel);
- Contain a list, including case name, court, and docket number, of all other cases in which you and/or your counsel has filed an objection to any proposed class action settlement in the past three (3) years;
- State whether the Objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; and
- State whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through counsel.

To be timely, written notice of an objection in the appropriate form **must be filed** with the Court by **January 9, 2026**, and copies may be sent to Class Counsel and Defendants. The addresses for each are as follows:

THE COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL
Circuit Court of the Second Judicial District in and for Leon County Florida 301 S Monroe Street Tallahassee, FL 32301	Mariya Weekes Milberg Coleman Bryson Phillips Grossman, PLLC 201 Sevilla Avenue, 2 nd Floor Coral Gables, FL 33134 Terence R. Coates Markovits, Stock & Demarco LLC 119 E. Court Street #530 Cincinnati, OH 45202	Julie Singer Brady Baker & Hostetler, LLP 200 South Orange Avenue, Suite 2300 Orlando, FL 32801-3432

21. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court you do not like something about the Settlement or the requested Attorneys' Fees, Costs, and Expenses Award or Service Awards. You can object only if you stay in the Settlement Class (i.e., if you do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you exclude yourself, you cannot object to the Settlement.

THE FINAL APPROVAL HEARING

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **March 2, 2026 at 9:00 a.m.** before Judge John Cooper of the Second Judicial District in and for Leon County, Florida, 301 S Monroe Street, Tallahassee, Florida 32301, via Zoom.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve: the Settlement, Class Counsel's application for reasonable Attorneys' Fees, Costs and Expenses Award and for Service Awards. If there are Objections, the Court will consider them. The Court will also listen to people who have asked to speak at the hearing. The Court can only approve or deny the Settlement Agreement. It cannot change the terms of the Settlement.

Note: The date and time of the Final Approval Hearing are subject to change. The Court may also decide to hold the hearing via videoconference or by phone. Any change will be posted at www.TallahasseePixelSettlement.com.

23. Do I have to attend to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to attend the hearing to speak about it. As long as you file your written objection on time, the Court will consider it.

24. May I speak at the Final Approval Hearing?

Yes, as long as you do not exclude yourself, you can (but you do not have to) participate and speak for yourself at the Final Approval Hearing at your own expense. This is called making an appearance.

Questions? Go to www.TallahasseePixelSettlement.com or call (833) 417-4926

You also can have your own lawyer speak for you, but you will have to hire and pay for your own lawyer. If you choose to make an appearance, you must follow all of the procedures for objecting to the Settlement listed in Question 19 above and specifically include a statement whether you and your counsel will appear at the Final Approval Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive any Settlement benefits. You will give up rights explained in the “Excluding Yourself from the Settlement” section of this Long-Form Notice, including your right to start or continue a lawsuit, or be part of any other lawsuit against the Defendant or any of the Released Parties about the legal issues in this lawsuit that are released by the Settlement Agreement.

GETTING MORE INFORMATION

26. How do I get more information?

This Long-Form Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.TallahasseePixelSettlement.com, by calling (833) 417-4926, or by writing to:

TMH Pixel Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

**PLEASE DO NOT TELEPHONE THE COURT, THE COURT’S CLERK OFFICE, OR
TMH OR ITS COUNSEL REGARDING THIS NOTICE.**