

# **NOTICE OF PROPOSED CLASS LITIGATION SETTLEMENT**

**District Court of Travis County, Texas, 261<sup>st</sup> Judicial District**

***Mediate v. Life Line Screening of America, Ltd.***

**Cause No. D-1-GN-25-000401**

**A Court has authorized this Long-Form Notice (“Notice”). This is not a solicitation from a lawyer.**

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**IF YOU ARE AN INDIVIDUAL WHO SET HEALTH SCREENINGS THROUGH LIFE LINE, OR PURCHASED TEST KITS THROUGH LIFE LINE, USING A WEBSITE OR WEB PLATFORM DURING THE PERIOD FROM JUNE 1, 2018, TO THE PRESENT, YOU MAY BE ELIGIBLE TO RECEIVE A SETTLEMENT PAYMENT FROM A CLASS ACTION SETTLEMENT.**

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This Litigation is titled *Mediate v. Life Line Screening of America, Ltd.*, Cause No. D-1-GN-25-000401 and is pending in the District Court of Travis County, Texas, 261<sup>st</sup> Judicial District. The Person that filed the class action lawsuit is called the “Plaintiff” or “Settlement Class Representative” and the company they sued is Lifeline Screening of America, Ltd., the “Defendant.”

The Litigation claims that the Defendant, a medical device company incorporated in Texas, intentionally exposed the Plaintiff’s and Settlement Class Members’ confidential personally identifiable information and protected health information to third Parties, including Meta Platforms, Inc. (d/b/a Meta) and Google, Inc., through the use of the tracking technologies on the Defendant’s website. Plaintiff alleges the Defendant used the tracking technologies to surreptitiously transmit the Plaintiff’s and Settlement Class Members’ communications with the Defendant’s website to Meta and other third Parties, including the text and phrases website visitors type into search box queries and detailed information about which types of medical screening tests they have selected and ordered from the Defendant. The Defendant denies any wrongdoing whatsoever.

**Who is a Settlement Class Member?** There are two subclasses that make up the Settlement Class:

- 1) **Nationwide Settlement Class**: All individuals who set health screenings through Life Line, or purchased test kits through Life Line, using a website or web platform during the period from June 1, 2018, to the present.
- 2) **California Settlement Class**: All individuals residing in the State of California who set health screenings through Life Line, or purchased test kits through Life Line, using a website or web platform during the period from June 1, 2018, to the present.

Settlement Class Members under the Settlement Agreement will be eligible to receive compensation based on the subclass they are in:

- **Nationwide Settlement Class**: Nationwide Settlement Class members may make a claim for a cash payment of **\$20**.
- **California Settlement Class**: Settlement Class Members who resided in California when they set their screening or made their purchase from Life Line on the internet may alternatively choose to make a claim for a payment of **\$50** in recognition of their release of California statutory claims. **A California Settlement Class member may not choose both benefits.**

**Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

	<b>Summary of Legal Rights</b>	<b>Deadline(s)</b>
<b>Submit a Claim Form</b>	The only way to receive a Settlement Payment from the Settlement.	Submitted or postmarked on or before <b>February 17, 2026</b> .
<b>Exclude Yourself by Opting Out of the Class</b>	Receive no payment from the Settlement. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant relating to the Litigation.	Mailed and postmarked on or before <b>February 2, 2026</b> .
<b>Object to the Settlement and/or Attend the Final Approval Hearing</b>	You can write the Court about why you agree or disagree with the Settlement. You can also ask to speak at the Final Approval Hearing on <b>March 12, 2026, at 9:00 a.m. CT</b> about the fairness of the Settlement, with or without your own attorney.	Mailed and postmarked on or before <b>February 2, 2026</b> .
<b>Do Nothing</b>	You will not receive any Settlement Payments from this class action Settlement. If the Settlement becomes Final, you will give up your rights to sue the Defendant (or any Related Parties) separately for claims relating to the Litigation or to continue to pursue any such claims you have already filed.	N/A

- Your rights and options as a Settlement Class Member – **and the deadlines to exercise your rights** – are explained in this Notice.
- The Court will still have to decide whether to approve the Settlement. Settlement Payments to Settlement Class Members will be made only if the Court approves the Settlement and after any possible appeals are resolved.

## What This Notice Contains

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## BASIC INFORMATION

### 1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to grant final approval and make the Settlement Final. This Notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

The Honorable Judge Daniella Deseta Lyttle of the District Court of Travis County, Texas, 261<sup>st</sup> Judicial District is overseeing this case captioned as *Mediate v. Life Line Screening of America, Ltd.*, Cause No. D-1-GN-25-000401. The Person who brought the lawsuit is called the “Settlement Class Representative.” The entity being sued, Life Line Screening of America, Ltd., is called the “Defendant.”

### 2. What is the Litigation about?

Defendant is a medical device company incorporated in Texas.

The Litigation claims that the Defendant, a medical device company incorporated in Texas, intentionally exposed the Plaintiff’s and Settlement Class Members’ confidential personally identifiable information and protected health information to third parties, including Meta Platforms, Inc. (d/b/a Meta) and Google, Inc., through the use of the tracking technologies on the Defendant’s website. The Plaintiff alleges the Defendant used the tracking technologies to surreptitiously transmit the Plaintiff’s and Settlement Class Members’ communications with the Defendant’s website to Meta and other third Parties, including the text and phrases website visitors type into search box queries and detailed information about which types of medical screening tests they have selected and ordered from the Defendant.

The Defendant denies any wrongdoing whatsoever. No court or other judicial body has made any judgment or other determination that the Defendant has done anything wrong.

### 3. Why is this a class action?

In a class action, one or more people called Settlement Class Representatives (in this case, Rocco Mediate) sue on behalf of all people who have similar claims. Together, all of these people are called a “Settlement Class,” and the individuals are called “Settlement Class Members.” One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

### 4. Why is there a Settlement?

The Court has not decided in favor of the Settlement Class Representative or Defendant. Instead, both sides agreed to this Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The Settlement Class Representative appointed to represent the Settlement Class, and the attorneys for the Settlement Class (also referred to as “Class Counsel”) think the Settlement is best for all Settlement Class Members.

## WHO IS IN THE SETTLEMENT?

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

There are two subclasses that make up the Settlement Class:

- 1) **Nationwide Settlement Class**: All individuals who set health screenings through Life Line, or purchased test kits through Life Line, using a website or web platform during the period from June 1, 2018, to the present.

Questions? Go to [www.lifelinepixelsettlement.com](http://www.lifelinepixelsettlement.com) or call (833) 754-9440.

- 2) **California Settlement Class:** All individuals residing in the State of California who set health screenings through Life Line, or purchased test kits through Life Line, using a website or web platform during the period from June 1, 2018, to the present.

Excluded from the Settlement Classes are: (1) the judge presiding over this Action, and members of her direct family; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parent companies have a controlling interest and their current or former officers and directors; and (3) Class Members who valid Request for Exclusion prior to the Opt-Out Deadline.

#### 6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call **(833)754-9440** with questions or you may also write with questions to:

Life Line Pixel Settlement Administration  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150

### THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

#### 7. What does the Settlement provide?

The Defendant agrees to make available up to \$1,400,000 in order to: (1) compensate Settlement Class Members who submit a valid and timely claim to the Settlement Administrator; and (2) pay the Notice and Settlement Administration Costs. In no event will the Defendant's liability to compensate Settlement Class Members and the Notice and Settlement Administration Costs, collectively, exceed \$1,400,000. This amount does not include the payment of any Service Award to the Settlement Class Representative or the Attorneys' Fees and Expenses Award, which will be paid by the Defendant separately from the Settlement consideration.

Under the Settlement Agreement, Settlement Class Members may submit a claim to receive compensation based on the subclass they are in, either:

- **Nationwide Settlement Class:** Nationwide Settlement Class Members may make a claim for a cash payment of **\$20**.
- **California Settlement Class:** Settlement Class Members who resided in California when they set their screening or made their purchase from Life Line on the internet may alternatively elect to make a claim for a payment of **\$50** in recognition of their release of California statutory claims. **A California Settlement Class member may not choose both benefits.**

### HOW DO YOU SUBMIT A CLAIM?

#### 8. How do I get a Settlement Payment?

To receive a Settlement Payment, you must complete and submit a Claim Form online at [www.lifelinepixelsettlement.com](http://www.lifelinepixelsettlement.com) or by mail to Life Line Pixel Settlement Administration, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150- 5391. Read the Claim Form instructions carefully, fill out the Claim Form and submit online by **February 17, 2026**, or by mail

postmarked by **February 17, 2026**.

**TO RECEIVE AN ELECTRONIC PAYMENT FOR YOUR VALID CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT [WWW.LIFELINEPIXELSETTLEMENT.COM](http://WWW.LIFELINEPIXELSETTLEMENT.COM)**

**9. When will I get my Settlement Payment?**

The Court will hold a Final Approval Hearing on **March 12, 2026, at 9:00 a.m. CT** to decide whether to approve the Settlement. You do not need to attend the Final Approval Hearing. If the Court approves the Settlement, there may be appeals from that decision and resolving them can take time. It also takes time for all of the Claim Forms to be processed. Please be patient. Settlement Payments will begin after the Settlement has obtained Court approval and the time for all appeals has expired.

**10. What am I giving up as part of the Settlement?**

The Defendant and its affiliates will receive a release from all claims that could have been or that were brought against the Defendant relating to the Litigation. Thus, if the Settlement becomes Final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue the Defendant and past or present parents, subsidiaries, divisions, and related or affiliated entities of any nature whatsoever, whether direct or indirect, as well as each of the Defendant's and these entities' respective predecessors, successors, assigns, shareholders, members, trustees, directors, officers, employees, principals, agents, attorneys, representatives, providers, advisors, consultants, contractors, vendors, partners, insurers, reinsurers, and subrogees, and includes, without limitation, any Person related to any such entity who could have been named as a Defendant in this Litigation. This release (the "Released Claims") is described in the Settlement Agreement, which is available at **[www.lifelinepixelsettlement.com](http://www.lifelinepixelsettlement.com)**. If you have any questions, you can talk to the law firms listed in Question 16 for free or you can talk to your own lawyer.

**EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want to be part of the Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as "opting out" of the Settlement Class.

**11. If I exclude myself, can I get a benefit from this Settlement?**

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement.

**12. If I do not exclude myself, can I sue the Related Parties for the same thing later?**

No. Unless you exclude yourself, you give up any right to sue the Defendant and any other Related Parties for any claim that could have been or was brought relating to the Litigation. You must exclude yourself from the Settlement to start your own lawsuit or to be part of any other lawsuit relating to the claims in this case.

**13. How do I exclude myself from the Settlement?**

To exclude yourself, send a "Request for Exclusion," or written notice, of intent to opt out that says you want to be excluded from the Settlement in *Mediate v. Life Line Screening of America, Ltd.*, Cause No. D-1-GN-25-000401. Each Person wishing to opt out of the Settlement Class must sign and timely mail or submit online via the Settlement Website written notice of such intent by **February 2, 2026**. The written Questions? Go to [www.lifelinepixelsettlement.com](http://www.lifelinepixelsettlement.com) or call (833) 754-9440.

notice must: (i) identify the case name and number of this Litigation; (ii) state the Settlement Class Member's full name, address, and telephone number; (iii) contain the Settlement Class Member's personal and original signature (or electronic signature); (iv) state unequivocally the Settlement Class Member's intent to be excluded from the Settlement Class; and (v) request exclusion only for that one Settlement Class Member whose personal and original signature appears on the request. You must mail your Request for Exclusion to the Settlement Administrator postmarked by **February 2, 2026**, to:

Life Line Pixel Settlement Administration  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

All Requests for Exclusion must be submitted individually in connection with a Settlement Class Member; for example, one request is required for every Settlement Class Member seeking exclusion. Any Requests for Exclusion seeking exclusion on behalf of more than one Settlement Class Member will not be valid.

### **OBJECTING TO THE SETTLEMENT**

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

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. Any Settlement Class Member who has not excluded themselves from the Settlement and who wishes to object to the proposed Settlement may submit a timely written notice of his or her objection to the Settlement Administrator by mail or through the Settlement Website, with a postmark date **no later than February 2, 2026**, to the following address:

Life Line Pixel Settlement Administration  
c/o Kroll Settlement Administration LLC  
P.O. Box 22539  
New York, NY 10150- 5391

Each Objection must:

- 1) include the case name and number of the Litigation;
- 2) set forth the Settlement Class Member's full name, current address, telephone number, and email address;
- 3) contain the Settlement Class Member's personal and original signature (or electronic signature);
- 4) if the objecting Settlement Class Member is represented by an attorney, or received assistance from an attorney in drafting his or her objection, the name, address, telephone number, and email address of the attorney;
- 5) contain a statement indicating the basis for the objecting Settlement Class Member's belief that he or she is a member of the Settlement Class;
- 6) state whether the objection applies only to the Settlement Class Member, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- 7) set forth a statement of the legal and/or factual basis for the Objection; and
- 8) state whether the objecting Settlement Class Member intends to appear at the Final Approval Hearing, and if so, whether personally or through counsel.

In addition to the above, if an objecting Settlement Class Member is represented by counsel and the counsel intends to speak at the Final Approval Hearing, the written objection must also include: (i) the identity of witnesses, if any, whom the objecting Settlement Class Member intends to call to testify at the Final Approval Hearing; (ii) a description of any documents or evidence that the objecting Settlement Class Member intends to offer at the Final Approval Hearing; and (iii) a list, including case name, court,

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and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement in the past three (3) years.

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

Objecting is telling the Court that you do not like the Settlement or parts of it and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, you have no basis to object because you are no longer a Settlement Class Member, and the case no longer affects you.

**THE LAWYERS REPRESENTING YOU**

**16. Do I have a lawyer in this case?**

Yes. The Court appointed John J. Nelson of Milberg Coleman Bryson Phillips Grossman, PLLC and Jonathan Jagher of Freed Kanner London & Millen LLC, as Class Counsel to represent the Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense.

**17. How will the lawyers be paid?**

Class Counsel will ask the Court to approve an Attorneys' Fees and Expenses Award not to exceed \$800,000, which will be paid by the Defendant separately from the Settlement Fund. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent fee basis.

Class Counsel will also ask the Court for a Service Award up to of \$3,500 to the Settlement Class Representative, in recognition of his contributions to this Litigation. The Court-approved amount for any Service Award will also be paid by the Defendant separately from the Settlement Fund.

**THE COURT'S FINAL APPROVAL HEARING**

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

The Court may hold a Final Approval Hearing at **9:00 a.m. CT, on March 12, 2026**, via Zoom as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them. The Court will also rule on any motion seeking payment of reasonable Attorneys' Fees and Expenses Award, as well as a Service Award for the Settlement Class Representative. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice.

**19. Do I have to attend the hearing?**

No. Class Counsel will represent the Settlement Class before the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 14, the Court will consider it.



**20. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file an objection according to the instructions in Question 14, including all the information required. If you do not timely file an objection according to the instructions in section 14, you will not be able to object to the Settlement at the Final Approval Hearing.

**IF YOU DO NOTHING**

**21. What happens if I do nothing?**

If you do nothing, you will not receive any benefits from this Settlement. If the Settlement is granted final approval and becomes Final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or the other Related Parties based on any claim that could have been or that was brought relating to the Litigation.

**ADDITIONAL INFORMATION**

**22. How do I get more information?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at **[www.lifelinepixelsettlement.com](http://www.lifelinepixelsettlement.com)**. You may also call the Settlement Administrator with questions or to receive a Claim Form at **(833) 754-9440**.

**23. What if my contact information changes or I no longer live at my address?**

It is your responsibility to inform the Settlement Administrator of your updated information. You may do so at the address below, by calling toll-free **(833) 754-9440** or at the Contact section of the Settlement Website.

Life Line Pixel Settlement Administration  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

**PLEASE DO NOT CONTACT THE COURT, CLERK OF THE COURT, OR DEFENDANT FOR INFORMATION ABOUT THE CLASS LITIGATION SETTLEMENT**