

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Jarrell v. Adena Health System
Case No. 25CI000419
Court of Common Pleas for Ross County, Ohio

IF YOU LOGGED INTO YOUR ADENA HEALTH SYSTEM PATIENT PORTAL BETWEEN NOVEMBER 1, 2022 AND JUNE 3, 2024, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.

A court has authorized this notice of proposed class action settlement (the “Notice”). This is not a solicitation from a lawyer. You are not being sued.

Please read this Notice carefully and completely.

- A settlement (the “Settlement”) has been reached with Adena Health System (“Adena” or “Defendant”) in a class action lawsuit (the “Litigation”). The Litigation concerned Adena’s alleged use of third-party tracking technologies, called “tracking pixels,” on its web pages. The plaintiff claims that using tracking pixels violated certain privacy laws.
- The Litigation is called *Jarrell v. Adena Health System*, Case No. 25CI000419. It is pending in the Court of Common Pleas for Ross County, Ohio.
- Adena denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to the Settlement to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- Adena's records indicate that you are a Class Member and entitled to benefits under the Settlement. You may have received a previous notice directly from Adena.
- 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
SUBMIT A CLAIM	<p>The only way to receive benefits from the Settlement is by submitting a valid and timely Online Tracking Tools Settlement Claim Form (the “Claim Form”).</p> <p>The fastest way to submit your Claim Form is online at www.AdenaPixelSettlement.com (the “Settlement Website”). 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>	March 6, 2026
OPT OUT OF THE SETTLEMENT	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 Defendants related to the legal claims resolved by the Settlement. You may hire a lawyer at your own expense.	February 4, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	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 Form.	February 4, 2026
DO NOTHING	Unless you opt out, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from the 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 the Settlement.	No Deadline

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

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
WHO IS IN THE SETTLEMENT	4
THE SETTLEMENT BENEFITS.....	4
SUBMITTING A CLAIM FORM FOR SETTLEMENT BENEFITS	5
THE LAWYERS REPRESENTING YOU	5
EXCLUDING YOURSELF FROM THE SETTLEMENT	6
COMMENTING ON OR OBJECTING TO THE SETTLEMENT.....	7
THE COURT’S FINAL APPROVAL HEARING	8
IF I DO NOTHING	8
GETTING MORE INFORMATION	9

Basic Information

1. Why was this Notice issued?

The Ross County Court of Common Pleas, Ohio, 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 Litigation, your legal rights, what benefits are available, and who can receive them.

The Litigation is called *Jarrell v. Adena Health System*, Case No. 25CI000419. It is pending in the Ross County Court of Common Pleas, Ohio. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, Adena Health System, is called the “Defendant.”

2. What is this lawsuit about?

The Litigation alleges that Adena used third-party tracking technologies, called “tracking pixels,” on its website in a way that violates certain 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. This individual is called the “Plaintiff” or “Class Representative.” 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 Representative is Robin Jarrell. Everyone included in the Litigation are the Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant are right. Both sides have agreed to the Settlement to avoid the costs and risks of a trial and to allow the Class Members to receive benefits from the Settlement. The 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: “All patients of Defendant who logged into its patient portal between November 1, 2022 and June 3, 2024.”

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) Adena and its employees, officers, and directors; (3) Adena's Counsel and in-house counsel; and (4) 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@AdenaPixelSettlement.com
- Call toll free, 24/7: (833) 417-4976
- By mail: Adena Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You may also view the Settlement Agreement at www.AdenaPixelSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Adena 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

1. **Privacy Monitoring.** All Class Members are eligible to enroll in one year of CyEx Privacy Shield Global. This comprehensive service is designed to restore users' privacy and anonymity, and includes:
 - Dark Web scanning
 - Compromised password scanning
 - VPN, password manager, and other online privacy tools

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

2. **Cash Payment.** All Class Members may claim a one-time **\$21.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

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

- Email: info@AdenaPixelSettlement.com
- Call toll free, 24/7: (833) 417-4976
- By mail: Adena Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

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

If you stay in the Class, you won't be able to be part of any other lawsuit against Adena about the issues this Settlement covers. The "Releases" section of the Settlement Agreement (Section 3) describes the legal claims you give up if you remain in the Class. The Settlement Agreement is available at www.AdenaPixelSettlement.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.AdenaPixelSettlement.com. If you prefer, you can download a printable Claim Form from the Settlement Website and mail it to the Settlement Administrator.

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, at (833) 417-4976, or by email, at info@AdenaPixelSettlement.com.

10. Are there any important Settlement payment deadlines?

If you submit a Claim Form online, you must do so by **March 6, 2026**. If you submit a Claim Form by U.S. mail, the completed and signed Claim Form must be postmarked no later than **March 6, 2026**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on May 29, 2026 (**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 filed.

Settlement payments 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 has appointed attorneys Joseph M. Lyon of The Lyon Firm; Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman PLLC; Philip J. Krzeski of Chestnut Cambron PA; and Terence R. Coates and Dylan J. Gould of Markovits Stock & DeMarco, LLC, 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 \$555,000.00 as reasonable attorneys' fees and costs of litigation. This amount will be paid by Adena.

Class Counsel will also ask for a Service Award payment of \$2,500.00 for the Class Representative (the "Service Award"). The Service Award payment will also be paid by Adena.

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 (a “Request for Exclusion”), also referred to as “opting out.” If you opt out, you are telling the Court that you do not want to be part of the Settlement, and you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue Adena on your own about the legal issues in the Litigation.

The deadline to opt out of the Settlement is **February 4, 2026**.

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

- (1) the name of the Litigation: *Jarrell v. Adena Health System*, Case No. 25CI000419, pending in the Court of Common Pleas for Ross County, Ohio;
- (2) your full name, mailing address, telephone number, and email address;
- (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:

Adena Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Your Request for Exclusion must be submitted, postmarked, or emailed by **February 4, 2026**.

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. Objecting means telling the Court your reason(s) 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 Litigation: *Jarrell v. Adena Health System*, Case No. 25CI000419, pending in the Court of Common Pleas for Ross County, Ohio;
- (2) your full name, mailing address, telephone number, and email address;
- (3) information that proves that you are a Class Member (such as a notice you have received, or proof that you used the patient portal between November 1, 2022 and June 3, 2024);
- (4) a clear description of all the reasons you object; include any legal support, such as documents or citations to legal authority, you may have for your objection;

- (5) if you have hired your own lawyer in connection with this objection, provide their name, bar number, and contact information (address, telephone number, and email address);
- (6) if you have hired your own lawyer, their signed statement or certificate of representation;
- (7) if you or your lawyer have objected in any other cases in the past three years, list the names, courts, and civil action numbers for each of those cases;
- (8) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (9) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both; and,
- (10) your signature.

To be valid, your objection must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **February 4, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

Clerk of the Court	Settlement Administrator
Clerk of the Court 2 North Paint Street Chillicothe, OH 45601	Adena Tracking Tools Settlement ATTN: Objections P.O. Box 25226 Santa Ana, CA 92799
Class Counsel	Counsel for Defendants
Dylan J Gould Markovits, Stock & DeMarco, LLC 119 E. Court Street, Suite 530 Cincinnati, OH	Christopher G. Dean McDonald Hopkins LLC 600 Superior Avenue East, Suite 2100 Cleveland, Ohio 44114

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You may 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 on **May 29, 2026 at 2:00 p.m. Eastern Time**, at The Ross County Court of Common Pleas, 2 North Paint Street, Courtroom #1, Chillicothe, OH 45601.

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 payment to the Class Representative. 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.AdenaPixelSettlement.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.AdenaPixelSettlement.com.

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

- Email: info@AdenaPixelSettlement.com
- Call toll free, 24/7: (833) 417-4976
- By mail: Adena Data Incident Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 2 North Paint Street, Chillicothe, OH 45601.

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