

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT  
FOR ALL INDIVIDUALS WHO ARE, OR WERE, WILLIS-KNIGHTON MEDICAL CENTER  
PATIENT PORTAL ACCOUNT HOLDERS OR WHO MADE A REQUEST TO SCHEDULE AN  
APPOINTMENT ONLINE BETWEEN JANUARY 1, 2018 AND DECEMBER 31, 2023**

*A Court 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 LONG-FORM NOTICE (“NOTICE”) CAREFULLY.**

**YOU MAY BE ENTITLED TO PARTICIPATE IN A CLASS ACTION SETTLEMENT  
BECAUSE YOU HAVE BEEN IDENTIFIED AS A WILLIS-KNIGHTON PATIENT  
PORTAL ACCOUNT HOLDER OR AS SOMEONE WHO MADE A REQUEST TO SCHEDULE AN  
APPOINTMENT ONLINE BETWEEN JANUARY 1, 2018 AND DECEMBER 31, 2023**

| <b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SUBMIT A CLAIM BY<br/>THE CLAIM DEADLINE<br/>OF DECEMBER 18, 2025</b>                             | <p>If you submit a Claim Form by <b>December 18, 2025</b>, you <b>are eligible to</b> receive compensation of varying amounts, depending upon what sub-class you are a member of. The amount will be stated in the notice you receive regarding the settlement. You will also be automatically entitled to one free year of enrollment in the CyEx Privacy Shield Pro product. The activation code for this product was provided on the notice you received. You must timely submit a Claim Form either via U.S. mail or online to receive compensation under this settlement.</p> <p><b>IF YOU DO NOTHING</b>, you will not receive compensation, but you will be bound by the settlement.</p> |
| <b>EXCLUDE YOURSELF<br/>FROM THE<br/>SETTLEMENT BY THE<br/>OPT-OUT DATE OF<br/>NOVEMBER 18, 2025</b> | <p>You will receive no benefits, but you will retain your legal claims against Willis-Knighton Medical Center.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>OBJECT BY THE<br/>OBJECTION DATE OF<br/>NOVEMBER 18, 2025</b>                                     | <p>File a written Objection to the settlement with the Court, explaining why you do not like the settlement, and serve copies of your Objection on all Class Counsel and Defendant’s Counsel, at the addresses listed in Response #16 below. You must remain in the Settlement Class to object to the settlement.</p>                                                                                                                                                                                                                                                                                                                                                                           |
| <b>ATTEND THE FINAL<br/>APPROVAL HEARING ON<br/>JANUARY 22, 2026 @<br/>9:00AM</b>                    | <p>Ask to speak in Court about the fairness of the settlement. You do not need to attend the hearing to receive compensation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

## **1. What is this Notice?**

This is a Court-authorized Notice of a proposed settlement of a class action, Jacqueline Horton, et al. v. Willis-Knighton Medical Center, pending in the 10th Judicial District Court for Natchitoches Parish, Case No. 93767, Division B, Judge Sylvester (the “Litigation”). The Persons who sued are called the “Plaintiffs” or “Class Representatives” and the company they sued, Willis-Knighton Medical Center, is known as the “Defendant.” The Litigation alleges that Willis-Knighton caused the unauthorized transmissions of personally identifiable, non-public medical information and communications to Facebook and Google through Willis-Knighton’s Website, <https://www.wkhs.com/>, and Patient Portal, <https://www.wkhs.com/mywk>. Willis-Knighton denies this allegation and specifically denies that any medical information from either the Patient Portal or the Website was shared with Facebook or Google. Nonetheless, the Parties collectively agreed to resolve their dispute on a class-wide basis. The Court has granted preliminary approval of the Settlement Agreement and has conditionally certified the Settlement Class (defined below in Response #6) for purposes of settlement only. 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: (1) an IntelliChart patient portal account holder through Willis-Knighton; (2) a Meditech patient portal account holder through Willis-Knighton; or (3) as someone who made a request to schedule an appointment online with Willis-Knighton from January 1, 2018 through December 31, 2023.

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

The Litigation alleges that Willis-Knighton caused the unauthorized transmissions of personally identifiable, non-public medical information and communications to Facebook and Google through Willis-Knighton’s Website, <https://www.wkhs.com/>, and Patient Portal, <https://www.wkhs.com/mywk>. Willis-Knighton denies this allegation, and specifically denies that any medical information from either the Patient Portal or the Website was shared with Facebook or Google. Nonetheless, the Parties collectively agreed to resolve their dispute on a class-wide basis.

## **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 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 Willis-Knighton to provide compensation to Settlement Class Members who submit valid and timely Claim Forms. The Settlement also requires Willis-Knighton to remove and refrain from using certain tracking technologies on its websites for a period of not less than two years. The settlement is not an admission of wrongdoing by Willis-Knighton and does not imply that there has been, or would be, any finding that Willis-Knighton violated the law.

The Court overseeing this Litigation must give final approval to the Settlement Agreement before it can become effective. The Court has conditionally certified the Settlement Class for settlement purposes only, 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 and no certification of the Settlement Class.

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

You are a Settlement Class Member if you are (1) an IntelliChart patient portal account holder through Willis-Knighton; (2) a Meditech patient portal account holder through Willis-Knighton; or (3) made a request to schedule an appointment online with Willis-Knighton from January 1, 2018 through December 31, 2023.

### **YOUR BENEFITS UNDER THE SETTLEMENT**

#### **7. What can I get from the settlement?**

Through the Settlement Willis-Knighton has agreed that Settlement Class Members can each make a claim for a cash payment; and will be automatically entitled to one year of the CyEx Privacy Shield Pro product, which has a further description here: <https://cyex.com/privacy-shield/>. The amount of the payment will be set forth in the notice you receive regarding the settlement. In addition, Willis-Knighton has agreed that for a period of two years following final approval of the Settlement Willis-Knighton will remove and refrain from using certain tracking technologies on Willis-Knighton's websites. The Settlement Agreement and more information regarding the Settlement are available at [www.WKMCDataSettlement.com](http://www.WKMCDataSettlement.com).

**\*\*\*To receive a cash payment, you must submit a Claim Form.**

#### **8. When will I receive the benefits?**

If you timely submit a valid Claim Form for monetary recovery, you will receive payment in the amount approved by the Settlement Administrator after the Settlement Administrator processes your Claim Form. You will receive such payment after the settlement is Final and has become effective.

#### **9. I want to be a part of the settlement. What do I do?**

To submit a claim for compensation, you must timely submit the Claim Form on the Settlement Website [www.WKMCDataSettlement.com](http://www.WKMCDataSettlement.com), or by mail to **WKMC Data Settlement, c/o Settlement Administrator PO Box 25226, Santa Ana, CA 92799**.

You must submit any claims by the Claims Deadline of **December 18, 2025**. There can be only one (1) valid and timely Settlement Claim per Settlement Class Member.

An enrollment code for Privacy Shield Pro was included in the notices sent to all class members. If you did not receive this notice, or no longer have it, please contact the Settlement Administrator.

The website to which you must go in order to utilize your code to enroll is <https://privacyshield.cyex.com/enrollment/WKMC>. Your Privacy Shield Pro subscription will become active upon Final Settlement Approval from the Court.

**QUESTIONS? VISIT [WWW.WKMCDATASETTLEMENT.COM](http://www.WKMCDATASETTLEMENT.COM)**

#### 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 Willis-Knighton a "release," which means you cannot sue or be part of any other lawsuit or other legal action against Willis-Knighton about or arising from the claims or issues in this Litigation with respect to the alleged sharing of your personal or health information.

The precise terms of the release are in the Settlement Agreement, which is available on 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. How much will the Class Representative receive?

Class Counsel shall request the Court to approve a Service Award for Class Representatives Jacqueline Horton, Crystal LaRue, and Chelsey Giddings of \$5,000 for their services to the Settlement Class as Class Representative. This payment is subject to the Court's approval.

### EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the settlement, but you want to preserve your legal claims against Defendant, 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 Jacqueline Horton, et al. v. Willis-Knighton Medical Center, 10th Judicial District Court for Natchitoches Parish, Case No. 93767, to the Settlement Administrator. Such opt-out request shall include: (1) your full name and address; (2) the case name and docket number; (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 November 18, 2025** to:

**WKMC Data Settlement  
c/o Settlement Administrator  
PO 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 anything resulting from the settlement, but you may sue Willis-Knighton 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 #16), you may still receive benefits if you timely file a claim.

## THE LAWYERS REPRESENTING THE CLASS

### 14. Do I have a lawyer in this case?

The Court has appointed Foster C. Johnson of Ahmad, Zavitsanos & Mensing, Jed Cain of Herman Katz Gisleson & Cain and Keenan K. Kelly of Kelly & Townsend, LLC to represent the Settlement Class as Class Counsel. These attorneys will be paid in an amount that must be approved by the Court. If you want to be represented by your own lawyer, you may hire one at your own expense.

### 15. How will the lawyers for the Settlement Class be paid?

Pursuant to the Settlement Class Counsel will request Attorneys' Fees and Expenses in an amount not to exceed Two Million One Hundred Thousand Dollars and Zero Cents (\$2,100,000.00) for reasonable costs and expenses incurred in prosecuting the Litigation, subject to Court approval. The motion for Attorneys' Fees and Expenses will be posted on the Settlement Website after it is filed.

## OBJECTING TO THE SETTLEMENT

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

You can tell the Court that you do not agree with the settlement or some part of it. If you are a Settlement Class Member, you can Object to the settlement and the Court will consider your views. To Object to the settlement, you must submit 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 should include:

- i. Settlement Class Member's full name, current address, telephone number, and email address;
- ii. contain the Settlement Class Member's original signature;
- iii. contain proof that the Settlement Class Member is a member of the Settlement Class (e.g., copy of settlement notice);
- iv. state that the Settlement Class Member objects to the Settlement, in whole or in part;
- v. a statement of the legal and factual basis for the Objection;
- vi. provide copies of any documents that the Settlement Class Member wishes to submit in support of his/her position;
- vii. identify all counsel representing the Settlement Class Member, if any;
- viii. contain the signature of the Settlement Class Member's duly authorized attorney or other duly authorized representative, along with documentation setting forth such representation; and
- ix. contain a list, including case name, court, 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.

Any Settlement Class Member who fails to timely file and serve an Objection and notice, if applicable, shall not be treated as having filed a valid Objection to the settlement and may not submit another objection to the settlement.

If you file an Objection, you may still receive benefits so long as you timely file a claim. To be timely, written notice of an Objection in the appropriate form must be filed with the Court no later than **November 18, 2025**, and served on Class Counsel and Defendant's Counsel, as noted below:

| Class Counsel                                                                                                                                                                                                                                                                                                                                              | Willis-Knighton's Counsel                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Foster C. Johnson<br/>Ahmad, Zavitsanos &amp; Mensing PLLC<br/>1221 McKinney St., Suite 2500<br/>Houston, Texas 77010</p> <p>Jed Cain<br/>Herman Katz Gisleson Cain<br/>909 Poydras St., Suite 1860<br/>New Orleans, Louisiana 70112</p> <p>Keenan K. Kelly<br/>Kelly &amp; Townsend, LLC<br/>137 Saint Denis St.<br/>Natchitoches, Louisiana 71457</p> | <p>David Carney<br/>Baker &amp; Hostetler LLP<br/>127 Public Square, Suite 2000<br/>Cleveland, Ohio 44114</p> <p>Lamar P. Pugh<br/>Pugh, Pugh, &amp; Pugh, L.L.P.<br/>333 Texas Street, Suite 2100<br/>Shreveport, Louisiana 71101</p> |

### 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 **January 22, 2026 @ 9:00am** in the courtroom of the Honorable Lala B. Sylvester, Division B, 10th JDC, 200 Church Street, Room 201, Natchitoches, Louisiana, 71457-4673.

. 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.

#### **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.WKMCDataSettlement.com](http://www.WKMCDataSettlement.com)

If you have any questions or need to change your address, you can contact the Settlement Administrator online at [www.WKMCDataSettlement.com](http://www.WKMCDataSettlement.com) or by mail at WKMC Data Settlement, c/o Settlement Administrator PO Box 25226, Santa Ana, CA 92799.

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

**QUESTIONS? VISIT [WWW.WKMCDATASETTLEMENT.COM](http://www.WKMCDATASETTLEMENT.COM)**