

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*J.A., T.A., and N.C. v. NorthBay Healthcare Corporation*

Case No. FCS059353

Superior Court of Solano County, California

**IF YOU VISITED NORTHBAY HEALTHCARE'S WEBSITE OR PATIENT PORTAL  
BETWEEN NOVEMBER 29, 2020, AND MAY 14, 2024,  
A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS,  
AND ENTITLE YOU TO A CASH PAYMENT.**

*A court has authorized this notice. This is not a solicitation from a lawyer.*

*You are not being sued.*

***Please read this Notice carefully and completely.***

- A Settlement has been reached with the NorthBay Healthcare Corporation (“NorthBay” or “Defendant”) in a class action lawsuit. This class action lawsuit is about the way NorthBay allegedly gathered users’ personal information and shared it with third parties like Facebook or Google (the “Pixel Disclosure”).
- The lawsuit is referred to as *J.A., T.A., and N.C. v. NorthBay Healthcare Corporation for the purposes of the settlement*, Case No. FCS059353, pending in the Superior Court of Solano County, California (the “Litigation”).
- NorthBay denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- NorthBay’s records indicate that you are a Class Member and entitled to benefits under the Settlement.
- 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
<b>SUBMIT A CLAIM</b>	<p>You will automatically receive an enrollment code for privacy protection services. However, the only way to receive a cash payment from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.NorthBayPixelSettlement.com">www.NorthBayPixelSettlement.com</a>. 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>	<b>March 12, 2026</b>
<b>OPT OUT OF THE SETTLEMENT</b>	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 this Settlement. You can hire your own lawyer at your own expense.	<b>March 12, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	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 in person or remotely on March 5, 2026. If you object, you may also file a claim for Settlement benefits.	<b>March 12, 2026</b>
<b>DO NOTHING</b>	You will automatically receive an enrollment code for privacy protection services. However, unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive a cash payment from this 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 this Settlement.	No Deadline

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

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## Basic Information

### **1. Why was this Notice issued?**

The Superior Court of Solano County, California, 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 lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is referred to as *J.A., T.A., and N.C. v. NorthBay Healthcare Corporation* for settlement purposes, Case No. FCS059353, pending in the Superior Court of Solano County, California. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”), and the company they sued, NorthBay Healthcare Corporation, is called the “Defendant.”

### **2. What is this lawsuit about?**

This class action lawsuit is about the way NorthBay allegedly gathered its Website and Patient Portal users’ personal information and shared it with third parties like Facebook or Google.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” 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 Representatives are J.A., T.A., and N.C., and everyone included in this Action are the Class Members.

### **4. Why is there a Settlement?**

The Court did not decide whether the Plaintiffs or the Defendants are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. Plaintiffs and their attorneys think the Settlement is best for all Class Members.

## **Who is in the Settlement?**

### **5. Who is included in the Settlement?**

The Court defined the Class as: “All individuals residing in California whose personal information or health information was or may have been disclosed to a third party without authorization or consent through any Tracking Tools on Defendant’s websites or patient portal between November 29, 2020, and May 14, 2024.”

This means that if you are a California resident and visited NorthBay’s Website or Patient Portal between November 29, 2020, and May 14, 2024, you are a Class Member.

### **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) NorthBay and its officers and directors; and (3) 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@NorthBayPixelSettlement.com](mailto:info@NorthBayPixelSettlement.com)
- Call toll free, 24/7: (833) 417-4991
- By mail: NorthBay Pixel Disclosure Settlement, c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799.

You may also view the Settlement Agreement at [www.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com).

## **The Settlement Benefits**

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

All Class Members are eligible for a one-year subscription to CyEx Privacy Shield Pro. This is a privacy protection service designed to enhance consumer data security and limit online tracking. All Class Members will receive an enrollment code by email or mail. If you are a Class Member but did not receive an enrollment code, please contact the Settlement Administrator.

In addition to privacy protection services, all Class Members may submit a claim for a one-time \$15.00 cash payment. No documentation or proof is required to claim the cash payment.

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

- Email: [info@NorthBayPixelSettlement.com](mailto:info@NorthBayPixelSettlement.com)
- Call toll free, 24/7: (833) 417-4991
- By mail: NorthBay Pixel Disclosure 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 NorthBay about the issues that this Settlement covers. The "Release" section of the Settlement Agreement (Section XIV) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com).

## **Submitting a Claim Form for a Settlement Payment**

### **9. How do I submit a claim for a Settlement cash benefit?**

The fastest way to submit your Claim Form is online at [www.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

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

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, at (833) 417-4991, by email [info@NorthBayPixelSettlement.com](mailto:info@NorthBayPixelSettlement.com), or by U.S. mail at the address above.

### **10. Are there any important Settlement deadlines?**

If you are submitting a Claim Form online, you must do so by March 12, 2026. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than March 12, 2026.

### **11. When will the Settlement benefits be issued?**

The Court will hold a final approval hearing on March 5, 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 they are 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 appointed attorneys at LippSmith LLP; Peiffer Wolf Carr Kane Conway & Wise LLP; and Almeida Law Group LLC, to represent you and other Class Members ("Class Counsel"). Their information is available at [www.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com).

### **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 up to \$345,000.00 in attorney fees and to be reimbursed for reasonable Litigation Expenses, which will be paid by NorthBay separate and apart from benefits paid for the Settlement Class relief.

Class Counsel will also ask for Service Award Payments of \$1,250.00 for each of the Class Representatives. Service Award Payment will also be paid by NorthBay separate and apart from benefits paid for the Settlement Class relief.

## 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. This is called a Request for Exclusion and is sometimes also called “opting out.” If you opt out, you will not receive a Settlement payment, but you will keep any rights you may have to sue NorthBay on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is March 12, 2026.

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

- (1) the name of the Action: *J.A., T.A., and N.C. v. NorthBay Healthcare Corporation*, Case No. FCS059353, pending in the Superior Court of Solano County, California;
- (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:

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

Your Request for Exclusion must be submitted, postmarked, or emailed by March 12, 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 to it. Objecting means telling the Court your reasons for 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 should provide the following information for the Court to consider your Objection:

- (1) the name of the Action: *J.A., T.A., and N.C. v. NorthBay Healthcare Corporation*, Case No. FCS059353, pending in the Superior Court of Solano County, California;
- (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);
- (4) whether the Objection applies only to you, or to other Class Members, as well;
- (5) a clear description of all the reasons you object, including any legal support you may have for your Objection;
- (6) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and contact information;
- (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 (or, if you have hired your own lawyer, your lawyer's signature).

For your written Objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete Objection with the Clerk of Court by March 12, 2026. You must also send a copy to the Settlement Administrator.

<b>Clerk of the Court</b>	<b>Settlement Administrator</b>
Clerk of the Court 580 Texas Street Fairfield, California 94533	NorthBay Pixel Disclosure Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799

**Any Settlement Class Member who fails to timely file an Objection pursuant to the requirements set forth above or otherwise as ordered by the Court, shall still have the right to appear in Court at the Final Approval Hearing to state his, her, or their objection.** The Court address is Department 8 of the Superior Court of Solano County, California, at 580 Texas Street, Fairfield, California 94533.

You may also appear to state your objection by remote means during the Final Approval Hearing using the Zoom link information below:

<https://solano-courts-cagov.zoomgov.com/j/1619704645?pwd=aUwyYUFUcU5Eazl6SEkrcmcRnRLUT09>

Meeting ID: 161 970 4645

Passcode: 675002

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One tap mobile

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## 17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can 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 hearing on **March 5, 2026 at 8:30 a.m. Pacific Time**, in Department 8 of the Superior Court of Solano County, California, at 580 Texas Street, Fairfield, California 94533.

The Court will decide whether to approve the Settlement. The Court will also decide how and what amount Class Counsel should be paid, and whether to award Service Award Payments to the Class Representatives. 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**). Any Settlement Class Member who fails to timely file a written Objection pursuant to the requirements set forth above or otherwise as ordered by the Court, shall still have the right to appear in Court at the Final Approval Hearing to state his, her, or their objection.

The date and time of this hearing may change without further notice. Please check [www.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com) for updates. You may also access the Court's online services to check the case status by visiting <https://portal.solano.courts.ca.gov/> and may check the Court's calendar using the case number by visiting <https://solano.courts.ca.gov/online-services/court-calendar>.

### 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?**

You will automatically receive an enrollment code for privacy protection services. However, if you do nothing, you will not receive a cash payment 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.NorthBayPixelSettlement.com](http://www.NorthBayPixelSettlement.com).

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

- Email: [info@NorthBayPixelSettlement.com](mailto:info@NorthBayPixelSettlement.com)
- Call toll free, 24/7: (833) 417-4991
- By mail: NorthBay Pixel Disclosure Settlement, c/o Settlement Administrator, P.O. Box 25226 Santa Ana, CA 92799.

You can also contact Class Counsel, whose information is listed on the Settlement Website.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 580 Texas Street, Fairfield, California 94533.

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