

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Supreme Court of the State of New York, County of Erie

J.C. v. Catholic Health System, Inc.

Index No. 811986/2025

A Court has authorized this Notice regarding a proposed settlement of the above-referenced action (“the Settlement”). This is not a solicitation from a lawyer.

If you are a current or former patient of CHS who logged into CHS’s MyChart patient portal from January 1, 2020, through December 11, 2025, or a current or former patient who sought and/or received treatment from CHS from January 1, 2020, through December 11, 2025, you may be eligible to receive a Settlement Benefit from a class action settlement.

This Action is titled *J.C. v. Catholic Health System, Inc.*, Index No. 811986/2025 and is pending in the Supreme Court of the State of New York, County of Erie. The Person that filed the class action lawsuit (the “Action”) is called the Plaintiff or Class Representative and the company they sued is Catholic Health System, Inc. referred to herein as the CHS or Defendant.

The Action alleges that Defendant’s alleged disclosure of its patients’ personally identifiable information to Meta, formerly known as Facebook, and other third parties without permission, was in violation of state and federal statutes. Defendant denies any wrongdoing whatsoever.

Who is a Settlement Class Member?

There are two Settlement Classes:

Settlement Subclass 1: All current or former patients who logged into CHS’s MyChart patient portal from January 1, 2020, through December 11, 2025.

Settlement Subclass 2: All other current or former patients of CHS or individuals who sought and/or received treatment from CHS from January 1, 2020, through December 11, 2025.

Excluded from the Settlement Classes are: (a) Defendant’s officers and directors; (b) the affiliates, legal representatives, attorneys, successors, heirs, and assigns of Defendant and (c) any Settlement Class Member who timely and validly requests to exclude themselves from the settlement. Also excluded from the Settlement Classes are members of the judiciary to whom this case is assigned, their families and members of their staff.

Settlement Class Members under the Settlement Agreement will be eligible to receive the following Settlement Benefits:

- ❖ **Settlement Payment:** Each Settlement Class Member belonging to Settlement Subclass 1 will be provided the opportunity to submit a Claim for a Settlement Payment of up to **\$20.00**. At the election of the Settlement Class Member, Settlement Payments may be paid via electronic payment (including PayPal, Venmo, Zelle, or other electronic payment system) or by check;
- ❖ **Privacy Monitoring:** Each Settlement Class Member belonging to Settlement Subclass 2 will be provided the opportunity to enroll in Privacy Monitoring through a Dashlane Premium Plan for a period of twelve (12) months;

Questions? Go to catholichealthsettlement.com or call (833) 420-3938

To obtain more information, visit catholichealthsettlement.com or call (833) 420-3938.

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

| | Summary of Legal Rights | Deadline(s) |
|--|--|--|
| Submit a Claim Form | The only way to receive a Settlement Benefit from the Settlement. | Submitted or postmarked by April 10, 2026. |
| Exclude Yourself by Opting Out of the Class | You can choose to opt out of the Settlement and receive no payment. This option allows you to keep your right to bring any other lawsuit against Defendant relating to the Action. You can hire your own legal counsel at your own expense. | Mailed and postmarked by March 11, 2026. |
| Object to the Settlement and/or Attend the Final Approval Hearing | You can write to the Court about why you agree or disagree with the Settlement. You can also ask to speak at the Final Approval Hearing on April 23, 2026 at 10:00 a.m. ET about the fairness of the Settlement, with or without your own attorney. If you object, you may also file a claim for Settlement Benefits. | Mailed and postmarked by March 11, 2026. |
| Do Nothing | You will not receive any Settlement Benefit from this class action settlement. If the Settlement becomes final, you will give up your rights to sue Defendant (or any Released Parties) separately for claims relating to the Action 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 Benefits to Settlement Class Members will be made only if the Court approves the Settlement and after any possible appeals are resolved.

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BASIC INFORMATION

1. Why is there a Notice?

The Supreme Court of New York, Erie County 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 of the Settlement. This Notice explains the nature of the lawsuit or Action that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

The Honorable Judge Diane Y. Devlin, J.S.C. of the Supreme Court of the State of New York, County of Erie is overseeing this case captioned as *J.C. v. Catholic Health System, Inc.*, Index No. 811986/2025. The Person who brought the lawsuit is called the Plaintiff. The company being sued, Catholic Health System, Inc., is called the Defendant or CHS.

2. What is the Action about?

The Action alleges that Defendant's alleged disclosure of its patients' personally identifiable information to Meta, formerly known as Facebook, and other third parties without permission, was in violation of state and federal statutes.

Defendant denies any wrongdoing whatsoever and specifically denies that any tracking technologies were implemented in CHS's patient portal or electronic medical record system.

3. Why is this a class action?

In a class action, one or more people called the Class Representatives sue on behalf of all people who have similar claims. Together, all of these people are called the Settlement Class, and the individuals are called Settlement Class Members. One court resolves the lawsuit 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 Plaintiff or Defendant. Instead, both sides have agreed to a settlement to avoid the cost and risk of a trial and related appeals, while providing benefits to Settlement Class Members. The 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?

You are affected by the settlement and potentially a Settlement Class Member if you are:

Settlement Subclass 1: All current or former patients who logged into CHS's MyChart patient portal from January 1, 2020, through December 11, 2025.

Settlement Subclass 2: All other former or current patients of CHS or individuals who sought and/or received treatment from CHS from January 1, 2020, through December 11, 2025, not including those in Settlement Subclass 1.

Excluded from the Settlement Classes are: (a) Defendant's officers and directors; (b) the affiliates, legal representatives, attorneys, successors, heirs, and assigns of Defendant and (c) any Settlement Class Member who timely and validly requests to exclude themselves from the settlement. Also excluded from the Settlement Classes are members of the judiciary to whom this case is assigned, their families and members of their staff.

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) 420-3938** with questions. You may also write with questions to:

Catholic Health
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

Defendant agrees to pay for all Approved Claims submitted by Settlement Class Members, Settlement Administration Expenses, attorneys' fees, and a Service Award as approved by the Court, to pay for: (a) Settlement Payments of up to \$20.00 each for Settlement Subclass 1 members; or (b) 12 months of Privacy Monitoring for Settlement Subclass 2 members.

Settlement Class Members under the Settlement Agreement may submit a Claim to receive:

- ❖ **Settlement Payment:** Each Settlement Class Member belonging to Settlement Subclass 1 will be provided the opportunity to submit a Claim for a Settlement Payment of up to **\$20.00**. At the election of the Settlement Class Member, Settlement Payments may be paid via electronic payment (including PayPal, Venmo, Zelle, or other electronic payment system) or by check;
- ❖ **Privacy Monitoring:** Each Settlement Class Member belonging to Settlement Subclass 2 will be provided the opportunity to enroll in Privacy Monitoring through the Dashlane Premium Plan for a period of twelve (12) months;
 - This program monitors the dark web for subscribers' personal information, provides a virtual private network ("VPN") to encrypt subscribers' data and mask their IP addresses, allows subscribers to use a private search engine that does not store personally identifiable information, automatically requests that data brokers remove subscribers' personal information, and manages subscribers' passwords across multiple devices, and allows consumers to store documents and records within an encrypted digital vault.

HOW DO YOU SUBMIT A CLAIM?

8. How do I get a Settlement Benefit?

To receive a Settlement Benefit, you must complete and submit a Claim Form online at catholichealthsettlement.com or by mail to *Catholic Health*, 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 **April 10, 2026**, or by mail **postmarked by April 10, 2026**.

TO RECEIVE AN ELECTRONIC OR ACH PAYMENT FOR YOUR APPROVED CLAIM, YOU MUST FILE A CLAIM FORM ONLINE AT [CATHOLICHEALTHSETTLEMENT.COM](https://catholichealthsettlement.com)

9. When will I get my Settlement Benefit?

The Court will hold a Final Approval Hearing on **April 23, 2026, at 10:00 a.m. ET** 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 Benefits 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?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. This Release is described in the Settlement Agreement, under Section 3, which is available at **catholichealthsettlement.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 Settlement 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 Released Parties for the same thing later?

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

13. How do I exclude myself from the settlement?

To exclude yourself, send a request to be excluded from the Settlement Class by sending a written request postmarked on or before March 11, 2026 approved by the Court. To exercise the right to be excluded, a Person in the Settlement Class must timely send a written request for exclusion to the Settlement Administrator as specified in the Notice, providing (i) his or her name and address, (ii) a signature, (iii) the name and number of the case, and (iv) a statement that he or she wishes to be excluded from the Settlement Class for purposes of this settlement. You must mail your request to be excluded to the Settlement Administrator **postmarked by March 11, 2026**, to:

Catholic Health
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

Any member of the Settlement Class who validly elects to be excluded from the Settlement Agreement shall not: (i) be bound by any orders or the Final Judgment; (ii) be entitled to relief under this Settlement Agreement; (iii) gain any rights by virtue of the Settlement Agreement; or (iv) be entitled to object to any aspect of the Settlement Agreement. The request for exclusion must be personally signed by the Person requesting exclusion. So-called “mass” or “class” opt-outs shall not be allowed.

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 wishes to object to the Settlement Agreement must file an objection with the Clerk of the Court, or alternatively, if the objection is from a Settlement Class Member represented by counsel, files any objection through the Court's electronic filing system, and (b) sends copies of such papers by mail, hand, or overnight delivery service to Class Counsel and Defendant's Counsel at the addresses below, with a postmark by **no later than March 11, 2026**:

| Clerk of the Court | Class Counsel | Defendant's Counsel |
|---|--|--|
| Chief Clerk's Office Erie County Court Building 25 Delaware Avenue Buffalo, NY 14202 | Philip J. Krzeski Chestnut Cambronne PA 100 Washington Ave. S., Ste. 1700 Minneapolis, MN 55401 | Lisa L. Smith, Phillips Lytle LLP One Canalside, 125 Main Street Buffalo, NY 14203 |

Each objection must present the objection in writing and postmarked by March 11, 2026, which must be personally signed by the objector, and must include:

- 1) the objector's name and address;
- 2) an explanation of the basis upon which the objector claims to be a Settlement Class Member;
- 3) all grounds for the objection, including all citations to legal authority and evidence supporting the objection;
- 4) the name and contact information of any and all attorneys representing, advising, or in any way assisting the objector in connection with the preparation or submission of the objection; and
- 5) a statement indicating whether the objector intends to appear at the Final Approval Hearing (either personally or through counsel who file an appearance with the Court in accordance with the Local Rules).

If a Settlement Class Member or any of the counsel has objected to any class action settlement where the objector or the counsel asked for or received any payment in exchange for dismissal of the objection, or any related appeal, without any modification to the settlement, then the objection must include a statement identifying each such case by full case caption and amount of payment received. Any challenge to the Settlement Agreement, the Final Order, or the Final Judgment shall be pursuant to appeal under the applicable rules of appellate procedure and not through a collateral attack.

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 benefit 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 Philip J. Krzeski of Chestnut Cambronne PA; Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman, PLLC; Joseph M. Lyon of The Lyon Firm; and Dylan Gould of Markovits, Stock & DeMarco, 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 seek approval from the Court for such Fee Award.

Class Counsel may receive, subject to Court approval, attorneys' fees, costs, and expenses not to exceed \$595,000. 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 \$5,000 to the Class Representative J.C. in recognition of their contributions to this Action.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at **10:00 a.m. ET on April 23, 2026**, via videoconference or in person (details will be posted on the settlement website) 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 Class Counsel's Fee Award, as well as a service award for the Class Representative. After the hearing, the Court will decide whether to approve the Settlement. The hearing may be moved to a different date or time without additional notice. Please check catholichealthsettlement.com for updates.

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 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 Defendant or the other Released Parties based on any claim that could have been or that was brought relating to the Action.

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 catholichealthsettlement.com. You may also call the Settlement Administrator with questions or to receive a Claim Form at **(833) 420-3938**.

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) 420-3938** or at the Contact section of the Settlement Website.

Catholic Health
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 ACTION SETTLEMENT**