This notice may affect your rights. Please read it carefully
A court has authorized this notice. This is not a solicitation from a lawyer.

YOUR RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
Submit a Claim Form	To receive a payment under this Settlement, you must submit a Claim Form by the Claim Form Deadline.	**September 15, 2025**
Opt-Out	Get out of the lawsuit and the Settlement. This is the only option that allows you ever to bring or join another lawsuit raising the same legal claims against the Defendants. You will receive no payment from this Settlement.	**September 15, 2025**
File Objection	Write to the Court about any aspect of the Settlement you don't like or you don't think is fair, adequate, or reasonable. If you object to any aspect of the Settlement, you must submit a written Objection by the Objection Deadline.	**September 15, 2025**
Go to a Hearing	Speak in Court about the Settlement. (If you object to any aspect of the Settlement, you **must first** submit a written Objection by the Objection Deadline noted above.)	**October 7, 2025**
Do Nothing	You will not receive any payment; also, you will have no right to sue later for the claims released by the Settlement.	

- These rights and options--and the deadlines to exercise them--are explained in this notice.

- The Court still must decide whether to approve the Settlement. Payments will be sent to Settlement Class members only if the Settlement Class members make valid claims and the Court approves the Settlement. If there are appeals, payments will not be made until the appeals are resolved and the Settlement becomes effective. Please be patient.

- **Fairness Hearing.** On October 7, 2025 at 9 a.m., the Court will hold a hearing to determine: (i) whether the proposed Settlement is fair, reasonable, and adequate and should receive final approval; (ii) whether the Claims of the Settlement Class against the Defendants should be dismissed with prejudice; (iii) whether Class Counsel's application for a fee award and expenses should be granted; and (iv) whether the application for the incentive award payments to the named plaintiffs should be granted. The Fairness Hearing will be held at the Milwaukee County Circuit Court, 901 N. 9th Street, Milwaukee, WI 53233 (the "Court"), in the courtroom of the Honorable Michael J. Hanrahan, which is located in Room 500. This Fairness Hearing date may change without further notice to you. Consult the Settlement Website at www.klechaclassaction.com, or the Court docket in this case, *Klecha et. al v. Froedtert Memorial Lutheran Hospital, Inc., et. al,* Milwaukee County Case No. 2023CV2394, for updated information on the Fairness Hearing date and time.

- This notice concerns cases called *Klecha et. al v. Froedtert Memorial Lutheran Hospital, Inc., et. al,* Milwaukee County Case No. 2023CV2394; and *Jasen v. Froedtert & The Medical College of Wisconsin Community Physicians, Inc.*, Milwaukee County Case No. 2023CV2440 (together, the "Lawsuits").

- A class action settlement in the Lawsuits will resolve the Settlement Class's claims against Froedtert Memorial Lutheran Hospital, Inc.; Community Memorial Hospital of Menomonee Falls, Inc; St. Joseph's Community Hospital of West Bend, Inc.; Froedtert & The Medical College of Wisconsin Community Physicians, Inc.; ("Defendants").
- This settlement affects all persons or entities who, between April 4, 2017 and April 5, 2018, or April 4, 2020 and the present (1) requested his or her own health care records, authorized another in writing to obtain his or her health care records, or was authorized in writing by a patient to request and obtain the patient's health care records from Defendants; and (2) was charged and paid a "paper copy" fee for electronic copies of health care records (the "Settlement Class"). Please see below for specific definitions and exclusions relating to the Settlement Class criteria.
- The Lawsuits contend that the Defendants charged "paper copy" fees for electronic copies of health care records when not permitted by Wisconsin law. The Lawsuits seek return of those fees, exemplary damages, and certain other remedies (the "Claims").
- Defendants deny liability.
- To settle the case, Defendants have agreed to pay each Settlement Class member who submits a Valid Claim the "paper copy" fee paid for electronic copies of the health care records, plus $175 in exemplary damages.
- Defendants will provide funds up to $3,055,323.17 to pay all Valid Claims.
- Defendants have also agreed to pay incentive payments of $5,000 each to Sharon Klecha, Todd Reynolds, Katherine Prbylski, and James Jasen for serving as Plaintiffs in the Lawsuits.
- Defendants have also agreed to pay for the costs associated with the administration of the case, including the claims process described below.
- Cannon & Dunphy, the lawyers who brought the Lawsuit ("Class Counsel"), will ask the Court for $855,491 in attorneys' fees and expenses, which will be paid separately by Defendants.
- **Your legal rights are affected whether you act or do not act. Read this notice carefully.**

This notice summarizes the proposed Settlement. For the complete terms and conditions of the Settlement, please see the Settlement Agreement available at www.klechaclassaction.com or contact the Settlement Administrator at:

Klecha v Froedtert Memorial Lutheran Hospital
c/o Settlement Administrator
PO Box 23678
Jacksonville, FL 32241

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

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1. How Do I Know If I Am Affected By The Settlement?

This case involves claims that the Defendants charged "paper copy" fees for electronic copies of health care records requests for which those fees were not permitted under Wisconsin law. For purposes of Settlement only, the Court has conditionally certified a Settlement Class that is defined as:

Any person or entity who

1. Either:
   a. requested his or her own patient health care provider records, or authorized another in writing to obtain his or her own health care provider records, from Froedtert Memorial Lutheran Hospital, Inc.; Community Memorial Hospital of Menomonee Falls, Inc.; St. Joseph's Community Hospital of West Bend, Inc.; or Froedtert and The Medical College of Wisconsin Community Physicians, Inc. ("the Defendants"); or
   b. was authorized in writing by the patient to request and obtain the patient's health care provider records from the Defendants; and
2. was charged by Verisma Systems, Inc. a "paper copy" rate under Wis. Stat. § 146.83(3f)(b)1. (the "Challenged Fee") for electronic copies of patient health care records between April 4, 2017 and April 5, 2018, or April 4, 2020 and the present, either directly or indirectly; and
3. paid the Challenged Fee, either directly or indirectly.

Excluded from the Settlement Class are:

1. The Defendants' officers and directors;
2. Counsel of record in the Lawsuits; and
3. The judge(s) presiding or who have presided over the Lawsuits and their law clerk(s).

You are receiving this Notice because, according to the Defendants' records, you may be a member of the Settlement Class.

A Settlement Class member that has already been reimbursed for "paper copy" fees for electronic copies of health care records is ineligible to submit a Valid Claim. And for the avoidance of doubt, if a law firm paid the "paper copy" fees for electronic copies of health care records in connection with health care records it requested on behalf of its client, and that lawsuit has since resolved with the law firm receiving or obtaining for its client some amount of monetary relief

(e.g. payment or reimbursement), the presumption is that the law firm is ineligible to submit a Valid Claim.

2. What Is The Lawsuit About?

Plaintiffs allege that Defendants improperly charged "paper copy" fees for electronic copies of health care records that were not permitted under Wisconsin law.

3. Why Is There A Lawsuit?

Plaintiffs contend that they and the Settlement Class are entitled to reimbursement of the allegedly improperly charged "paper copy" fees for electronic copies of health care records, actual and exemplary damages, and certain other relief. Defendants have denied that they are liable to Plaintiffs or the Settlement Class.

4. Why Is This Case Being Settled?

Counsel for both Plaintiffs and Defendants have determined that there is significant risk in continuing the Lawsuits. Among other issues, the issues in the Lawsuits include: (i) whether Defendants acted knowingly and willfully, or negligently; (ii) whether Plaintiffs and the Settlement Class deserve exemplary damages; and/or (iii) whether Defendants may establish other defenses. In particular, even if Plaintiffs convince the judge or jury that they are entitled to reimbursement of the "paper copy" fees for electronic copies of health care records, there is a substantial risk that a judge or jury would not impose any damages, including exemplary damages. Even if Plaintiffs were to succeed in the trial court, any judgment would be at risk on appeal. After considering the risks and costs of further litigation, the Parties have concluded that it is desirable that the claims be settled and dismissed on the terms of the Settlement Agreement. Plaintiffs and Class Counsel believe that the terms and conditions of the Settlement are fair, reasonable, adequate, and equitable, and that the Settlement is in the best interest of the Settlement Class members.

If the Settlement does not become effective (for example, because it is not finally approved, or the approval is reversed on appeal), then this litigation will continue.

5. What Can I Get In The Settlement?

Settlement Class members who submit Valid Claims will receive a Settlement Benefit of the amount paid in "paper copy" fees for electronic copies of health care records, plus $175 in exemplary damages.

Defendants will provide funds up to $3,055,323.17 to pay Valid Claims. Valid Claims will be paid only if the Court approves the Settlement.

6. How Do I Make A Claim?

To make a Claim, you must access the Claim Form using a unique class member identifier contained on the notice provided by the Settlement Administrator and complete the Claim Form available on this Settlement Website www.klechaclassaction.com. You can submit the Claim Form online, or you can print it and mail it to the Settlement Administrator at:

Klecha v Froedtert Memorial Lutheran Hospital
c/o Settlement Administrator
PO Box 23678
Jacksonville, FL 32241

In order to make a Valid Claim, each Settlement Class member will need to follow the instructions on the Claim Form and, among other things, provide the unique invoice number from each invoice on which they were charged "paper copy" fees for electronic copies of health care records. No claims may be submitted as a group, aggregate, or class of persons.

Claim Forms must be submitted online or received by 11:59 p.m. Central Time on **September 15, 2025** (the "Claim Form Deadline").

To receive a Settlement Benefit, *Individual Claimants,* meaning patients who requested their own health care records or authorized another person in writing to request their health care records, must submit a signed certification that the Individual Claimant, among other things:

i. Has read and understands the proof of Claim Form;

ii. Believes in good faith that he or she is a member of the Settlement Class because he or she previously requested directly or had authorized someone in writing to obtain copies of his or her health care records;

iii. Was charged a "paper copy" fee for electronic health care records and paid that fee;

iv. Has neither assigned any right to recover that fee to any other party nor been reimbursed in part or in whole by a third-party for that fee; and

v. Has not submitted any other claim for the same payments, has not authorized any other person or entity to do so, and knows of no other person or entity having done so on his or her behalf.

To receive a Settlement Benefit, *Requester Claimants,* meaning Settlement Class members who had a patient's written authorization to obtain the patient's health care records, must submit a signed certification stating, among other things:

i. That the Requester Claimant has read and understands the Claim Form and believes in good faith that it is a member of the Settlement Class because it was authorized in writing by a patient to obtain copies of the patient's health care records;

ii. The amount paid for "paper copy" fees for electronic copies of health care records;

iii. The invoice number related to the "paper copy" fees for electronic copies of health care records in question;

iv. The case style, including cause number and court, or the claim number and insurance company name for any lawsuit or legal claim for which health care records were requested;

v. Whether the lawsuit or legal claim for which the health care records were requested is still open or pending;

vi. If the lawsuit or legal claim for which the health care records were requested is not still open or pending, then the date on which the matter for which the health care records were obtained for the individual was closed without reimbursement of the "paper copy" fees for electronic copies of health care records;

vii. That neither the patient nor anyone else has reimbursed the Requester Claimant, directly or indirectly, in part or in whole, for payment of any attorneys' fees or expenses in connection with representation, including but not limited to the "paper copy" fees for electronic copies of health care records in question;

viii. That the Requester Claimant has not assigned any right to recover these "paper copy" fees for electronic copies of health care records to any other party; and

ix. The entity's tax payer identifier.

For law firms, the certifications shall be provided by the managing shareholder, partner, or other person who has authorized to settle or resolve the law firm's legal rights under the penalty of perjury, and for other entities the certifications shall be provided by such person who has authority to settle and resolve that entity's legal rights.

For the avoidance of doubt, if a law firm paid for "paper copy" fees for electronic copies of health care records in connection with health care records it requested on behalf of its client for use in a lawsuit, and that lawsuit has since resolved with the law firm receiving or obtaining for its client some amount of monetary relief (e.g. payment or reimbursement), then in that situation the law firm would be ineligible to submit a Valid Claim.

Settlement Benefit payments will be issued only if the Court gives final approval to the proposed Settlement and after the final approval is no longer subject to appeal. Please be patient as this may take months or even years in the event of an appeal.

7. When Do I Get My Benefits?

Filing a Claim does not guarantee a Settlement Benefit payment. A Fairness Hearing is scheduled for October 7, 2025 at 9 am. If the Court approves the Settlement and there are no appeals, then Settlement Benefits will be distributed after the Settlement is no longer subject to appeal or review and the Settlement Administrator has completed its review and audit of all Claim Forms against the Defendants' records to validate the veracity of the claims, and prevent the payment of fraudulent or duplicative claims. If the Court does not approve the Settlement, or if the

Settlement is overturned on appeal, no Settlement Benefits will be issued.

8. What Do Plaintiffs And Their Lawyers Get?

To date, Class Counsel has not been compensated for any of their work on the Lawsuits since 2023. As part of the Settlement, Class Counsel will apply to the Court to separately award them an amount of $855,491 to pay their attorneys' fees and expenses. Defendants have agreed not to object to Class Counsel's application for these fees and expenses.

In addition, the Defendants have agreed not to object to incentive payments of $5,000 to each named Plaintiff. This payment is designed to compensate the named Plaintiffs for their time, effort, and risk undertaken in pursuing litigation.

Class Counsel shall file their application for a fee award and class service awards no later than fourteen (14) days prior to the Fairness Hearing. A copy of that application will be available on the Settlement Website. The Court will determine the amount of attorneys' fees and expenses as well as the amount of incentive payments. Any award of attorneys' fees, expenses, and incentive payments shall be in addition, not part of or subject to, the Settlement Amount of $3,055,323.17.

9. What Happens If I Do Not Opt-Out From The Settlement?

If you are a Settlement Class member and you do not Opt-Out from the Settlement, you will be legally bound by all orders and judgments of the Court, and you will also be legally bound to the Release of the Claims in the Settlement. This means that in exchange for being a Settlement Class member and being eligible for a Settlement Benefit, you will not be able to sue, continue to sue, or be part of any other lawsuit against Defendants for alleged illegal overcharges of "paper copy" fees for electronic copies of health care records unless you Opt-Out.

You will not be responsible for any out-of-pocket costs or attorneys' fees concerning this case if you stay in the Settlement Class.

Staying in the Settlement Class also means that you agree to the following terms of the Settlement that describe exactly the legal Claims that you give up:

Upon the entry of a Final Approval Order, Plaintiffs and members of the Settlement Class forever and completely release and discharge the Defendants, their agents, parents, subsidiaries, affiliates, employees, officers, directors, members, shareholders, attorneys, guarantors, successors, insurers, and assigns from any and all claims, demands, damages, complaints, costs, fees, losses, attorneys' fees, suits, actions, causes of action, and other liabilities of any kind or character, accrued or unaccrued, known or unknown, which they had, have, or could have asserted or claimed based on any act or omission that occurred up to the date of the execution of this Agreement related to the Claims. This release applies regardless of whether a Settlement Class member submits a Valid Claim or receives any Settlement Benefit.

10. How Do I Opt-Out From The Settlement?

You can Opt-Out from the Settlement Class if you wish to retain the right to sue Defendants separately for the Claims. If you Opt-Out, you cannot file a claim or Objection to the Settlement.

To Opt-Out, you must submit a written request for exclusion no later than September 15, 2025 to the Settlement Administrator, and to Class Counsel Brett A. Eckstein, Cannon & Dunphy, S.C., 595 N. Barker Road, Brookfield, WI 53008, beckstein@c-dlaw.com. The Opt-Out must reference the Lawsuits and include your name, address, and telephone number.

11. How Do I Object To The Settlement?

You can ask the Court to deny approval of the Settlement by timely filing an Objection with the Court. You cannot ask the Court to order a larger Settlement; the Court can only approve or disallow the Settlement. If the Court does not approve the Settlement, no Settlement Benefits will be sent out, and the lawsuit will continue.

You can also ask the Court to disapprove the requested incentive payments to Plaintiffs or the attorneys' fee and expense awards to Class Counsel.

You may also appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney.

If you want to raise an Objection to the Settlement at the Fairness Hearing, you must file your Objection in writing with the Clerk of the Court, delivered by mail, express mail, personal delivery, or electronic filing, such that the Objection is received by the Clerk on or before the Objection Deadline.

Any Objection must include:

i. a reference to this case, *Klecha et al. v. Froedtert Memorial Lutheran Hospital, Inc.*, Milwaukee County Circuit Court Case No. 23-CV-2394;

ii. the objector's full name, address, and telephone number;

iii. a written statement of all grounds for the objection accompanied by any legal and factual support for such objection;

iv. copies of any papers, briefs, or other documents upon which the objection is based;

v. a list of all persons who will be called to testify in support of the objection at the Fairness Hearing; and

vi. a statement as to whether the objector intends to appear at the Fairness Hearing. If the objector intends to appear at the Fairness Hearing through counsel, the objection must also state the identity of all attorneys representing the objector who will appear at the Fairness Hearing.

Failure to include this information and documentation may be grounds for overruling and rejecting your Objection.

By filing an Objection, you consent to the jurisdiction of the Court, including to any order of the Court to produce documents or provide testimony prior to the Fairness Hearing. You further

consent to a deposition, at the request of Class Counsel or Defendants' counsel, at least five (5) days prior to the Fairness Hearing.

If you file an Objection to the Settlement but still want to submit a Claim in the event the Court approves the Settlement, you must still timely submit a Claim Form according to the instructions described above.

You **must** also send a copy of your Objection to the Settlement Administrator, Class Counsel, and Defendants' counsel:

Class Counsel:
Brett A. Eckstein
Cannon & Dunphy
595 N. Barker Rd.
Brookfield, WI 53008

Counsel for Defendants:
Kelly J. Noyes
von Briesen & Roper, s.c.
411 E. Wisconsin Ave., #1000
Milwaukee, WI 53202

12. When Will The Court Decide If The Settlement Is Approved?

The Court will hold a Fairness Hearing to consider whether to approve the Settlement. The Fairness Hearing will be held in the Milwaukee County Circuit Court, 901 N. 9th Street, Milwaukee, WI 53233. The Fairness Hearing will be held in the courtroom of the Honorable Michael J. Hanrahan, which is located in Room 500, on October 7, 2025 at 9 am. The Fairness Hearing is open to the public. This Fairness Hearing date may change without further notice to you. Consult the Settlement Website at www.klechaclassaction.com for updated information on the Fairness Hearing date and time.

13. How Do I Get More Information?

You can inspect many of the court documents connected with this case on the Settlement Website. An online court docket is available for inspection at https://wcca.wicourts.gov/caseDetail.html?caseNo=2023CV002394&countyNo=40&index=0.

Papers filed in this lawsuit can be requested by contacting the court clerk.

You can contact the Settlement Administrator at:

Klecha v Froedtert Memorial Lutheran Hospital
c/o Settlement Administrator
PO Box 23678
Jacksonville, FL 32241
info@klechaclassaction.com

You can also obtain additional information by contacting Class Counsel:

Brett A. Eckstein
Cannon & Dunphy, S.C.
595 N. Barker Rd.
Brookfield, WI 53008
beckstein@c-dlaw.com