

Notice of Proposed Class Action Settlement

Howard v. Laboratory Corp. of Am., Case No. 1:23-cv-758-WO-JEP (M.D.N.C.).

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

- A proposed class action settlement has been reached in a lawsuit called *Howard v. Laboratory Corp. of America*, Case No. 1:23-cv-758-WO-JEP, pending in the Middle District of North Carolina. The proposed settlement, if approved, would resolve the case and provide benefits to Settlement Class Members.
- The lawsuit alleges that defendants Laboratory Corporation of America and Laboratory Corporation of America Holdings (together “Labcorp”) violated California and Pennsylvania wiretapping laws by facilitating, through third-party tracking technologies, the interception of personally identifiable information and searches that users conducted on Labcorp’s website. Labcorp denies these and all other allegations of wrongdoing and liability, and denies all claims asserted against it. The Court has not determined who is right or wrong.
- The settlement, if approved, would resolve the case and require Labcorp to implement certain business practices regarding the use of tracking technologies on its website, summarized below. The settlement does not provide monetary compensation to Settlement Class Members, and Settlement Class Members do not release any claims for damages or other monetary relief.
- Generally, you are a member of the Settlement Class if you live in California or Pennsylvania and conducted search queries on Labcorp’s website (www.labcorp.com or any subpages on this website) from May 1, 2021 to April 1, 2026.

If you are a member of the Settlement Class, your legal rights will be affected. Please read this notice carefully. The complete terms of the proposed settlement (including definitions for capitalized terms appearing in this notice) are set forth in the Settlement Agreement, which is available at www.LaboratoryCorporationWebsiteSettlement.com.

BASIC INFORMATION

1. Why was this notice issued?

A federal court authorized this notice to inform you of a proposed class action settlement. This notice explains the litigation, the proposed settlement, and your legal rights. It’s important that you read this notice carefully because your rights will be affected by this settlement.

2. What is a class action settlement?

In a class action, one or more people called class representatives sue on behalf of people who have similar claims. All these people are called class members.

A class action settlement is an agreement to resolve a lawsuit that applies to all the class members, not just the people who filed the lawsuit. A class action settlement is only legally effective if a court approves it as fair, reasonable, and adequate.

Questions? Call 1-877-378-7520 or visit www.LaboratoryCorporationWebsiteSettlement.com.

To resolve this matter without the expense, delay, and uncertainties of protracted litigation, the Parties reached a settlement that, if approved by the Court, would resolve all claims for injunctive relief brought on behalf of putative class members in Plaintiffs' complaint.

The Court has preliminarily approved that settlement and authorized this notice to inform you of your rights. The Court will hold a hearing on **December 14, 2026 at 10:00 A.M.** to decide whether to grant final approval to the settlement.

3. What is this lawsuit about?

Plaintiffs allege that Labcorp violated California and Pennsylvania wiretapping laws by facilitating, through third-party tracking technologies, the interception of personally identifiable information and searches that users conducted on Labcorp's website. Labcorp denies these and all other allegations of wrongdoing and liability, and denies all claims asserted against it. The Court has not decided who is right or wrong.

Plaintiffs and Labcorp have now agreed to a settlement to resolve this lawsuit, as described below. By agreeing to the settlement, Labcorp has not admitted that it is liable or that there is any merit to the allegations and claims made in this case. Instead, the proposed settlement, if finally approved, will resolve the lawsuit without deciding who is right or wrong.

This lawsuit is called *Howard v. Laboratory Corp. of America*, Case No. 1:23-cv-758-WO-JEP. The United States District Court for the Middle District of North Carolina is overseeing this lawsuit.

WHO IS IN THE SETTLEMENT

4. Am I a part of the Settlement Class?

The Settlement Class is defined as follows:

- **California Settlement Class:** All persons in California who conducted Search Queries on Labcorp's website from May 1, 2021 to April 1, 2026.
- **Pennsylvania Settlement Class:** All persons in Pennsylvania who conducted Search Queries on Labcorp's website from May 1, 2021 to April 1, 2026.

"Search Queries" means search terms and/or search queries, including but not limited to, entry of any search term(s) into a search bar or search menu on the Labcorp website, www.labcorp.com and its subpages, as well as making any selection(s) from any drop-down menu on the website.

Excluded from the Settlement Class are Labcorp, its current employees, officers, directors, legal representatives, heirs, successors and wholly or partly owned subsidiaries or affiliated companies; the lawyers for the Plaintiffs and their employees; and the judge and court staff to whom this Action is assigned.

SETTLEMENT BENEFITS—WHAT YOU GET

5. What does the settlement provide?

If the settlement is approved, or after any potential appeals of that approval are resolved, Labcorp has agreed to the following terms:

- Not using or enabling certain tracking technologies (as defined by the settlement agreement, but examples include the Meta Pixel and Google Analytics) on its website, labcorp.com or any of its subpages, for two years;
- Conducting an annual review and preparing a compliance report demonstrating that it is not using technologies prohibited by the settlement;
- Create or maintain a written policy regarding the appropriate use of externally developed tracking technologies on its website; and
- Designating a senior employee responsible for overseeing compliance with the above terms.

The complete terms of the proposed settlement are set forth in the Settlement Agreement, which is available at www.LaboratoryCorporationWebsiteSettlement.com. This notice provides only a summary of the terms of the proposed settlement.

6. Will I get money if the settlement is approved?

No. The settlement provides only injunctive relief. Under the settlement terms, Settlement Class Members (except for Settlement Class Representatives) will not release any claims for damages or other monetary relief.

7. What am I giving up in exchange for the settlement benefits?

If the settlement is approved, you will give up the right to sue Labcorp and other affiliated entities for injunctive relief claims arising from or related to the allegations in this lawsuit. You will not release any claims for damages or other monetary relief.

The complete terms of the proposed settlement are set forth in the Settlement Agreement, which is available at www.LaboratoryCorporationWebsiteSettlement.com. Among other things, the Settlement Agreement describes the claims you are releasing (called the “Released Claims”).

YOUR RIGHTS AND OPTIONS

8. Can I opt-out or exclude myself from the settlement?

No. Because the plaintiffs are seeking only injunctive relief (e.g., business practice terms) and because Labcorp is only agreeing to injunctive relief, Settlement Class Members cannot opt out of the settlement. This means that all members of the Settlement Class will be bound by the settlement, if the Court approves it.

Questions? Call 1-877-378-7520 or visit www.LaboratoryCorporationWebsiteSettlement.com.

9. What if I disagree with the settlement?

If you are a Settlement Class Member, you may object to or comment upon the proposed settlement by asking the Court to deny approval of the settlement and explaining why you believe the settlement should not be approved. You cannot ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval of the settlement, none of the agreed-upon terms in the settlement will be required to be implemented, and the lawsuit will continue.

Any objection to the proposed settlement must be made in writing and mailed to the Court at the following address: Clerk, U.S. District Court for the Middle District of North Carolina, 324 W. Market Street, Greensboro, NC 27401. All objections must be postmarked by November 23, 2026.

To be considered, your objection must include the following information:

- (a) the case name and number (*Howard v. Laboratory Corp. of Am.*, Case No. 1:23-cv-758);
- (b) your name, mailing address, e-mail address, and signature and, if represented by counsel, your counsel's signature;
- (c) the specific aspect of the settlement or request for attorneys' fees to which you object or wish to comment upon, along with any legal support you wish to bring to the Court's attention and any evidence you wish to introduce; and
- (d) a statement of membership in the Settlement Class that clearly identifies that you conducted a Search Query on Labcorp's Website during the relevant period and the state in which you resided and/or were located when you conducted the Search Query.

Any Settlement Class Member who does not object in accordance with the requirements above waives the right to object or to be heard at the Final Approval Hearing (discussed below).

10. What happens if I do nothing?

You are not required to do anything to obtain the benefit of the injunctive relief provided by the settlement. If the settlement is approved, you will be bound by the settlement.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

Yes. The Court has appointed the following "Settlement Class Counsel" to represent the interests of the class: Douglas I. Cuthbertson of the law firm Lieff Cabraser Heimann & Bernstein, LLP, Matthew R. Wilson of the law firm Meyer Wilson Werning Co., LPA, and Brian Levin of the law firm Levin Law, P.A.

You do not have to pay Settlement Class Counsel. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

12. How will the lawyers and the Settlement Class Representatives be paid?

Settlement Class Counsel will file a motion on or before November 14, 2026, asking the Court to award them attorneys' fees and reimbursement of litigation expenses in an aggregate amount not to exceed \$4.875 million. Settlement Class Counsel will also request a service award of up to \$2,500 to each of three Settlement Class Representatives as compensation for their efforts and commitment on behalf of the Settlement Class. The Court may award less than these amounts.

If you wish to object to or comment upon the request for an award of attorneys' fees and reimbursement of expenses, or request for service awards, you must comply with the procedures described in Section 9 of this notice. Any objection must be made in writing and mailed to the Court at the following address: Clerk, U.S. District Court for the Middle District of North Carolina, 324 W. Market Street, Greensboro, NC 27401. All objections must be postmarked by **November 23, 2026**.

THE FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing to decide whether to approve the settlement. The Final Approval Hearing will be held at **10:00 A.M. Eastern Time on December 14, 2026** in Courtroom 1 of the U.S. District Court for the Middle District of North Carolina, 324 W. Market Street, Greensboro, NC 27401. The hearing may be held virtually by video conference or moved to a different date or time without additional notice. Please check www.LaboratoryCorporationWebsiteSettlement.com for updates.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and whether to award attorneys' fees, expenses, and service awards as described above, and in what amounts. If there are objections, the Court will consider them. After the hearing, the Court will decide whether to approve the Settlement. It is not necessary for you to attend this hearing, but you may attend at your own expense.

14. 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 submit a Notice of Intention to Appear along with your written comment. You may include this request in any objection you file (see Section 9 above). If you intend to appear at the Final Approval Hearing through counsel, the Notice of Intention to Appear must also identify all attorneys who will appear at the Final Approval Hearing. Please be sure to include your full name, address, and telephone number, and to the extent not otherwise submitted in relation to a filed objection, copies of any documents you will present to the Court in connection with the Final Approval Hearing. You cannot speak at the hearing if you do not file a timely notice.

Your Notice of Intention to Appear must be mailed to the Court at the following address: Clerk, U.S. District Court for the Middle District of North Carolina, 324 W. Market Street, Greensboro, NC 27401. All notices must be postmarked by **November 23, 2026**.

GETTING MORE INFORMATION

15. How can I obtain more information?

If you have any questions or want more information about the settlement, please visit www.LaboratoryCorporationWebsiteSettlement.com or contact the Settlement Administrator at 1-877-378-7520 or by writing to PO Box 6659, Portland, OR 97228-6659.