

Class Action Notice | Authorized by the U.S. Bankruptcy Court

In re Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al., Case No. 25-40976-357
United States Bankruptcy Court for the Eastern District of Missouri

**Did you visit lemonaidhealth.com
between June 30, 2019 through July 14, 2025?**

***You may be eligible for a cash payment from
a class action settlement.***

**Read this Notice carefully and completely as it tells you what
you can get from the Settlement with Lemonaid Health.
It also describes what your other options are.**

Important things to know:

- This is a class notice for *A.J., et al. v. Lemonaid Health Inc. and LMND Medical Group, Inc. d/b/a Lemonaid Health*, Case No. 3:23-cv-03288 filed in the United States District Court for the Northern District of California (the “Pixel Action”).
- The parties in the Pixel Action have reached a Settlement which has been preliminarily approved by the United States Bankruptcy Court for the Eastern District of Missouri as *In re Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al.*, Case No. 25-40976-357.
- If you take no action, you will still be bound by the Settlement.
- You must file a Claim Form by February 23, 2026 to receive a cash payment.
- The deadline to Opt-Out is January 5, 2026.
- The deadline to Object is January 5, 2026.

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About this Notice

1. Why did I get this Notice?

A federal bankruptcy court authorized this Notice because you have a right to know about the proposed Settlement in the case, and all of your options, before the Court decides whether to approve the Settlement. If the Court approves it, and after any appeals are resolved, an administrator appointed by the Court will process all claims, make payments, and provide access to the benefits that the Settlement allows. You can keep informed of the progress at the Settlement Website, www.LemonaidPixelSettlement.com.

This Notice Explains:

- The lawsuit
- The Settlement
- Your legal rights
- The Settlement benefits
- Who can get benefits
- How to get benefits

2. What do I do next?

Read this Notice carefully to determine if you are a Settlement Class Member and to understand the Settlement and its benefits.

You must submit a Claim Form to receive a cash payment.

Read on to understand the specifics of the Settlement, your choices, and what each choice would mean for you.

3. What are the deadlines I should be aware of?

- Your deadline to Object: **January 5, 2026**
- Your deadline to Opt-Out of the Settlement: **January 5, 2026**
- Final Approval Hearing: **January 20, 2026**
- Your deadline to submit a Claim Form: **February 23, 2026**

Learning About the Lawsuit

4. What is this lawsuit about?

The lawsuit claims that Lemonaid Health Inc. installed and implemented tracking pixels on its website, <https://www.lemonaidhealth.com/>, that disclosed users individually identifiable health information and protected health information (together "Private Information") to third parties without users' knowledge or consent.

Private Information varied by individual but may have included: medical conditions users were seeking treatment for, medications and services sought, Facebook ID, IP address.

5. What is the lawsuit called?

The federal lawsuit was initially entitled *A.J., et al. v. Lemonaid Health Inc. and LMND Medical Group, Inc. d/b/a Lemonaid Health*, Case No. 3:23-cv-03288. In March 2025, Chrome Holding Co. (formerly known as 23andMe Holding Co.), the company affiliated with Lemonaid Health Inc. and LMND Medical Group, Inc. (collectively, “Lemonaid Health”), initiated bankruptcy proceedings, *In re Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al.*, Case No. 25-40976-357 (E.D. Mo.) (“Bankruptcy Proceedings”). In the Bankruptcy Proceedings, the individuals who sued Lemonaid Health are now called the Pixel Class Representatives (“Class Representatives”) and Lemonaid Health is now referred to as the “Debtor.” U.S. Bankruptcy Judge Brian C. Walsh is overseeing the Bankruptcy Proceedings.

6. What are the claims in the lawsuit?

The Class Representatives claim that Lemonaid Health unlawfully disclosed their Private Information to unauthorized third parties such as Facebook and Google (together the “Pixel Information Recipients”) and that they suffered harm as a result. Lemonaid Health denies any wrongdoing, and no court or other entity has made any judgment or determination as to who is right or wrong, or that any law has been violated.

Want to know more?

Review the most recent Complaint on the Settlement Website, which describes the Class Representatives’ legal claims against Lemonaid Health, and the relief sought in the lawsuit.

7. What is a class action?

In a class action, one or more people file a lawsuit to assert legal claims on behalf of themselves and other people who have experienced the same or similar circumstances. These individuals are known as “class representatives.” Together, the people included in the class action are called a “class,” “class members” or “Settlement Class Members.”

8. Why is there a Settlement in this lawsuit?

The Court did not decide in favor of the Class Representatives or the Debtors. Instead, both sides agreed to a settlement. That way, they avoid the risk and cost of further litigation and allow the Settlement Class Members to receive payments from the Settlement. The Class Representatives and Pixel Class Counsel believe the Settlement is in the best interests of the Settlement Class.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide benefits to Settlement Class Members.

Important Facts About the Settlement

9. How do I know if I am part of this Settlement?

You are a Settlement Class Member if you visited <https://www.lemonaidhealth.com/> between June 30, 2019 through July 14, 2025 (“Pixel Settlement Class Members”).

10. Are there exceptions to being included?

Yes, the Pixel Settlement Class **does not** include:

- 1) Lemonaid Health and its officers and directors;
- 2) all Pixel Settlement Class Members who timely and validly elect to Opt-Out from the Pixel Settlement Class; and
- 3) the Judge assigned to evaluate the fairness of this Settlement.

11. I’m still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call **(833) 630-5415**, send an email to **info@LemonaidPixelSettlement.com** or explore the settlement website, **www.LemonaidPixelSettlement.com**, for more information.

12. What claims am I releasing if I stay in the Settlement Class?

Unless you exclude yourself or “Opt-Out” from the Settlement, you will remain in the Pixel Settlement Class, which means that all of the Court’s orders will apply to you and legally bind you, and you agree to the “Mutual Releases” set forth in Section III of the Settlement Agreement and the Addendum to the Settlement Agreement located on the Settlement Website. In contrast, if you Opt-Out of the Settlement, you will retain any remaining rights regarding the disclosure of your Private Information to the Pixel Information Recipients that are not otherwise barred or released by the bankruptcy proceedings.

The Settlement Benefits

13. What does the Settlement provide?

If the Settlement is approved by the Court, a \$3,250,000 Settlement Fund will be established. The Settlement Fund will be used to:

- (1) Make cash payments to Pixel Settlement Class Members who submit valid Claim Forms; See Nos. 14-15;
- (2) Pay Service Awards to Class Representatives (up to a total of \$55,000), as approved by the Court;
- (3) Pay attorneys' fees of up to one third of the Settlement Fund and reimburse expenses, as approved by the Court; and
- (4) Pay the costs of notifying Pixel Settlement Class Members of the Settlement and for the administration of the Settlement.

Want to know more?

For more detailed information on the benefits of the Settlement, please see the Settlement Agreement and Pixel Class Benefits Plan on the settlement website.

14. How do I get a Settlement payment?

To get a Settlement Payment you must submit a Claim Form. You can submit a Claim Form with the required attestation online or by U.S. mail. Online Claim Forms must be submitted by **11:59 p.m. Central Time on February 23, 2026**. Mailed Claim Forms must be postmarked by **February 23, 2026**. To fill out and submit a Claim Form online, visit the settlement website, **www.LemonaidPixelSettlement.com**.

Submit a Claim Form

Claim Forms can be submitted online or printed from the settlement website and mailed to:

Lemonaid Pixel Settlement
c/o Kroll Settlement Administration
PO Box 225391
New York, NY 10150-5391

15. When will I get my payment?

The Court will hold a hearing on January 20, 2026 to consider:

- (1) whether to approve the Settlement;
- (2) any objections;
- (3) the requests for awards to the Class Representatives (a total of \$55,000); and
- (4) the request for an award of attorneys' fees (up to one third of the Settlement Fund) and expenses to Pixel Class Counsel for their work in this Litigation.

Please be patient.

Settlement payments will be distributed as soon as possible once the Court grants Final Approval of the Settlement and after any appeals are resolved in favor of the Settlement.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Class Members will be informed of the progress of the Settlement [here](#).

16. How much will my payment be?

Payment amounts will not be determined until after the deadline to file a claim has passed. The Net Settlement Fund (amount remaining after deducting attorneys' fees and expenses, Class Representative service awards, and the costs of administering the Settlement) will be distributed equally among all Pixel Settlement Class Members who submit a valid Claim Form.

Excluding Yourself from the Settlement

17. Why would I Opt-Out of the Settlement?

If you do not want to receive a payment from this Settlement, and you want to keep your right, if any, to separately pursue claims regarding the disclosure of your Private Information to the Pixel Information Recipients that are not otherwise barred or released by the bankruptcy proceedings, you must take steps to exclude yourself from the Settlement Class. This is called "Opting-Out" of the Settlement Class. Please note that by Opting-Out, you will not be entitled to any of the benefits contemplated in this Settlement and you will be barred from pursuing any and all claims you may have against Lemonaid Health, Inc. or any of the debtors in the Bankruptcy Proceedings.

18. How do I Opt-Out of the Settlement?

Settlement Class Members who timely filed an individual proof of claim in the Bankruptcy Proceedings were provided with the opportunity to Opt-Out of the Settlement through the chapter 11 solicitation process.

If you did not timely file an individual proof of claim in the Bankruptcy Proceedings, you may exclude yourself from the Settlement by submitting a completed and signed Opt-Out request. Please note, however, that Settlement Class Members who (a) timely filed individual proofs of claim in the Bankruptcy Proceedings and (b) did not timely or validly Optout of the Settlement as part of the chapter 11 solicitation process, may no longer opt out by submitting an Opt-Out request.

Your written Opt-Out request must include:

- (1) the case name and number of the Litigation: *In re: Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al.*, Case No. 25-40976-357;
- (2) your name, current mailing address, and email address;
- (3) a statement indicating that you are a Pixel Settlement Class Member and you want to be excluded from this Settlement, for example “I am a Pixel Settlement Class Member because I accessed www.lemonaidhealth.com at least once between June 30, 2019 through July 14, 2025 and I want to be excluded from this Settlement”; and
- (4) your signature.

You may only exclude yourself—not any other person unless that person is under your legal guardianship (such as a minor child). Opt-Out requests seeking exclusion on behalf of more than one individual may be found invalid by the Settlement Administrator at its sole discretion.

Your Opt-Out request must be postmarked **no later than January 5, 2026**, to:



19. What happens if I Opt-Out of the Settlement?

If you ask to be excluded (“Opt-Out”), you are stating to the Court that you do not want to be part of the Settlement. You will not be eligible to receive a Settlement payment, and you cannot object to the Settlement. You will retain any remaining rights to pursue claims regarding the disclosure of your Private Information to the Pixel Information Recipients that are not otherwise barred or released by the Bankruptcy Proceedings (note that you will still be barred from pursuing any and all claims you may have against Lemonaid Health, Inc. or any of the debtors in the Bankruptcy Proceedings).

20. If I Opt-Out, can I get any benefits from this Settlement?

No. If you Opt-Out, you will not receive a Settlement payment.

Objecting to the Settlement

21. What does it mean to object to the Settlement?

If you are a Pixel Settlement Class Member, you may object to the Settlement if you do not like all or a portion of the Settlement. You can give reasons why you think the Court should not approve it. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. The Court will consider your views. If the Court denies approval, no Settlement payments will be provided to anyone, and the lawsuit will continue. If that is what you want to happen, you should object.

22. How do I tell the Court that I don't like the Settlement?

To object to the Settlement, you must submit a letter or other document to the Court that includes:

- (1) the case name and number of the Litigation: *In re: Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al.*, Case No. 25-40976-357;
- (2) your full name, address, telephone number, and email address (if any);
- (3) information which verifies you are a Pixel Settlement Class Member (e.g., the unique Claim ID provided on the Email Notice you received about this Settlement, or a sworn statement indicating that you accessed the Lemonaid website at least once during the proposed class period, such as "I certify that I accessed www.lemonaidhealth.com at least once between June 30, 2019 through July 14, 2025 and therefore am a Pixel Settlement Class Member");
- (4) a statement of all of the grounds for your objection, accompanied by any legal support for your objection;
- (5) a statement of whether the objection applies only to you, to a specific subset of the class, or to the entire class;
- (6) a statement of whether you intend to personally appear or speak at the Final Approval Hearing;
- (7) the identity of all counsel representing you and whether they will appear at the Final Approval Hearing;
- (8) a statement of whether you have sold or otherwise transferred your right of recovery to this Settlement to another person or entity, and, if so, the identity of the person or entity; and
- (9) your personal signature or your duly authorized representative's signature.

Your objection must be submitted to the Court by: (a) mailing it to the address below; or (b) delivering it in person at the United States Bankruptcy Court for the Eastern District of Missouri located at 111 South 10th St., 4th Floor, St. Louis, Missouri 63102. **Your objection must be filed, received by the Clerk, or postmarked on or before 11:59 p.m. (Central Time) on January 5, 2026.**

Clerk's Office
United States Bankruptcy Court for the Eastern District of Missouri
111 South 10th St., 4th Floor
St. Louis, MO 63102

23. May I or my attorney speak at the Final Approval Hearing?

Yes, you or your attorney may speak at the Final Approval Hearing about your objection. To do so, you must include a statement in your objection indicating that you or your attorney intends to appear at the Final Approval Hearing. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

The Lawyers Representing You

24. Do I have a lawyer in this case?

The Court has appointed lawyers, called "Pixel Class Counsel" to represent the Settlement Class in this case. Pixel Class Counsel are Matthew J. Langley of Almeida Law Group LLC and Nicholas A. Migliaccio of Migliaccio & Rathod, LLP:

Matthew J. Langley
ALMEIDA LAW GROUP LLC
849 W. Webster Avenue
Chicago, IL 60614

Nicholas A. Migliaccio
MIGLIACCIO & RATHOD, LLP
412 H. St. NE #302
Washington, DC 20002

You will not be charged for their services.

25. Should I get my own lawyer?

You do not need to hire your own lawyer to participate in the Settlement. If you object to the Settlement or otherwise want to be represented by your own lawyer, you may hire one at your own expense.

26. How will the lawyers be paid?

Pixel Class Counsel will ask the Court to approve payment of up to one third of the Settlement Fund for attorneys' fees and reimbursement of litigation expenses incurred in this case. The Court will decide how much Pixel Class Counsel will be paid and the amount of their reimbursement.

Lawyers' fees and expenses will only be awarded if approved by the Court as fair and reasonable in amount.

You have the right to object to the lawyers' fees even if you think the Settlement terms are fair. The lawyers' motion for attorneys' fees and costs will be filed with the Court and posted on the Settlement Website on or before December 20, 2025.

If You Do Nothing

27. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will not receive a payment from this Settlement and you will give up any remaining rights to pursue claims regarding the disclosure of your Private Information to the Pixel Information Recipients.

The Court's Final Approval Hearing

28. 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 hearing will be held at:

Where: United States Bankruptcy Court for the Eastern District of Missouri, 111 South 10th St., Courtroom 5 North, St. Louis, MO 63102

When: 10:00 a.m. CT on January 20, 2026

The date and time of the Final Approval Hearing may change without further notice to the class. You should check the settlement website frequently to confirm that the date has not changed.

Case: *In re Chrome Holding Co. (f/k/a 23andMe Holding Co.), et al.*, Case No. 25-40976-357

Judge: The Honorable Brian C. Walsh

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court may also decide how much Pixel Class Counsel and the Class Representatives are entitled to under the Settlement. If there are objections, the Court will consider them. The Court may listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

Because the Settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the Settlement before it can take effect.

29. Do I have to come to the hearing?

No. Pixel Class Counsel will answer questions the Court may have about the Settlement. You may attend at your own expense if you wish. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider your objection if it was filed on time.

Key Resources

30. How do I get more information about the Settlement?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement and the Settlement Benefits Plan. The Settlement Agreement and other related documents can be found on the settlement website.

If you have additional questions, you may:

- contact the Settlement Administrator by email, phone or mail;
- contact Pixel Class Counsel (information below); or
- access the Court Electronic Records (PACER) system online at <https://www.moeb.uscourts.gov/> or by visiting the Clerk's office of the Court (address below).

Resource	Contact Information
Settlement Website	www.LemonaidPixelSettlement.com
Email	info@LemonaidPixelSettlement.com
Phone	(833) 630-5415
Settlement Administrator	Lemonaid Pixel Settlement c/o Kroll Settlement Administration PO Box 225391 New York, NY 10150-5391
Your Lawyers	Matthew J. Langley ALMEIDA LAW GROUP LLC 849 W. Webster Avenue Chicago, IL 60614 Nicholas A. Migliaccio MIGLIACCIO & RATHOD, LLP 412 H. St. NE #302 Washington, DC 20002
Court	Office of the Clerk United States Bankruptcy Court for the Eastern District of Missouri 111 South 10th St., 4 th Floor St. Louis, MO 63102 HOURS: 8:30 a.m. to 4:30 p.m., Monday through Friday, except court-observed holidays. More information about the Court Clerk's office hours and other locations can be found at https://www.moeb.uscourts.gov/court-info/court-locations . PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.