Jane Doe and Janet Doe v. Missouri Delta Medical Center,

Case No. 23PE-CC00038 in the Circuit Court of Pemiscot County, State of Missouri

If You Are or Were a Patient of Missouri Delta Medical Center, Resided in Missouri, and Logged Into Its Patient Portal Between October 1, 2017, and December 31, 2022, You May Be Entitled to Receive Benefits From a Class Action Settlement.

A court authorized this Notice. You are not being sued.

This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit claiming that Defendant, Missouri Delta Medical Center ("MDMC" or "Defendant"), utilized third-party website technologies on its public website, resulting in the transmission of certain information to third parties. MDMC firmly denies all of Plaintiffs' claims in the lawsuit and maintains that it did nothing wrong but has agreed to the Settlement to avoid the expense, burden, and uncertainties associated with continuing litigation.
- You are included if you are a living person who is or was a patient of MDMC, resided in Missouri, and logged into the MDMC patient portal between October 1, 2017, and December 31, 2022.
- Persons included in the Settlement will be eligible to submit a Claim Form to receive a Cash Payment of $20.00. Settlement Class Members will also have the option to enroll in Privacy Shield.
- MDMC has agreed to pay all Approved Claims to the Settlement Class, together with Notice and Administrative Expenses, approved Fees Award and Costs to Settlement Class Counsel, and a Service Award Payment to the Settlement Class Representatives.
- Read this Notice carefully. Your legal rights are affected whether you act, or don't act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY DECEMBER 28, 2026	This is the only way to receive a Cash Payment.
SIGN UP FOR PRIVACY SHIELD	This is the only way to enroll in Privacy Shield. You may do this in addition to submitting a Claim Form for a Cash Payment. You will receive a separate email with instructions.
EXCLUDE YOURSELF BY NOVEMBER 25, 2026	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this Action.
OBJECT BY DECEMBER 28, 2026	Write to the Court explaining why you do not like the Settlement.
GO TO THE HEARING ON JANUARY 4, 2027	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You will not get a share of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this Action.

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights. The case is called *Jane Doe and Janet Doe v. Missouri Delta Medical Center*, Case No. 23PE-CC00038, pending in the Circuit Court of Pemiscot County, State of Missouri. The persons who sued are called the Plaintiffs. The Defendant is Missouri Delta Medical Center.

2. What is a class action?

In a class action, one or more people called the "Class Representatives" sue on behalf of a group or a "Class" of people who have similar claims. In a class action, the Court resolves the issues for all Class Members, except for those who exclude themselves from the class.

3. What is this lawsuit about?

This lawsuit alleges that MDMC's use of third-party website technologies on its public website was improper and resulted in transmission of certain information to third parties. MDMC firmly denies all of Plaintiffs' claims in the lawsuit and maintains that it did nothing wrong.

4. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid, timely claims will get compensation. The Settlement Class Representatives and their counsel believe the Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class and its members. The Settlement does NOT mean that MDMC did anything wrong.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The Settlement Class is defined as: "[A]ll living Missouri patients of MDMC who logged into the Patient Portal between October 1, 2017, and December 31, 2022, who are included on the Settlement Class List." Excluded from the Settlement Class are: (i) any judge or magistrate presiding over this Action, Court personnel, and members of their immediate families; (ii) the Defendant, Defendant's subsidiaries, affiliates, parents, successors, predecessors, and any entity in which the Defendant or its parent has a controlling interest and their current or former employees, officers, and directors; and (iii) Settlement Class Counsel, including any other attorneys representing Plaintiffs in this Action, and MDMC's Counsel.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Each Settlement Class Member will automatically receive a code to enroll in Privacy Shield Pro. The code is listed at the top of your Notice. Each Settlement Class Member who files a timely, valid Claim will also have the option to select a Cash Payment of $20.00. In addition, Defendant has agreed to pay the Notice and Administration Expenses of the settlement, the approved Fees Award and Costs to Settlement Class Counsel, and a Service Award Payment to the Settlement Class Representatives. To submit a Claim, you can do so online here: www.MDMCPixelSettlement.com. Or you may request a paper Claim Form by calling the number at the bottom of this Notice. A detailed description of the settlement benefits can be found in the Settlement Agreement. www.MDMCPixelSettlement.com.

7. How much will my Cash Payment be?

You must submit a Claim Form (*see* instructions below) to receive a Cash Payment. If you submit a valid Claim Form and elect to receive a Cash Payment, you will receive a $20.00 Cash Payment. You must verify that you are a Settlement Class Member when filing a Claim by providing the Settlement Class Member Login ID and Settlement Class Member Password on the Notice you received by email or mail. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please email MDMCPixelSettlement@atticusadmin.com to verify your identity and receive your Settlement Class Member Login ID and Settlement Class Member Password.

8. When will I get my Cash Payment?

The hearing to consider the fairness of the Settlement is scheduled for January 4, 2027. If the Court approves the Settlement, eligible Settlement Class Members whose Claims were approved by the Claims Administrator will receive their payment 60 days after the Settlement has been finally approved and any appeals process is complete. The payment will be made in the form of a check, unless you elect to receive payment by PayPal, Venmo, or Zelle, and all checks will expire and become void 60 days after they are issued.

HOW TO GET BENEFITS

9. How do I get a Cash Payment?

You must complete and submit a Claim Form to receive a payment. You may submit a Claim Form either electronically on the Settlement Website by clicking here www.MDMCPixelSettlement.com, or by printing and mailing in a paper Claim Form, copies of which are available for download here www.MDMCPixelSettlement.com. Claim Forms must be submitted online by 11:59 p.m. EST on December 28, 2026, or postmarked and mailed by December 28, 2026.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Settlement Class?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims this Settlement resolves. The Settlement Agreement describes the specific claims you are giving up against the Defendant. You will be "releasing" the Defendant and its affiliates described in the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are "releasing" the claims, regardless of whether you submit a Claim or not. The Settlement Agreement is available through the "court documents" link on the Settlement Website. The Settlement Agreement describes the Released Claims with specific descriptions, so read it carefully. If you have any questions, you may talk to the lawyers listed in Question 12 for free or you may, of course, talk to your own lawyer if you have questions about what this means.

11. What happens if I do nothing at all?

If you do nothing, you won't get any benefits from this Settlement. But, unless you request exclusion, you won't be able to start a lawsuit or be part of any other lawsuit against the Defendant for the claims being resolved by this Settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed Foster Johnson, Lynn Toops, and J. Gerard Stranch, IV to be the attorneys representing the Settlement Class. They are called "Settlement Class Counsel." They believe, after conducting a thorough investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

13. How will the lawyers be paid?

Settlement Class Counsel's Fees Award and Costs will be paid separately by Defendant and awarded by the Court. Settlement Class Counsel is entitled to seek no more than $575,000.00, but the Court may award less than this amount. As approved by the Court, the Settlement Class Representatives will separately be paid a service award by Defendant for helping to bring and settle the case. Settlement Class Representatives may seek up to $2,000.00 each ($4,000.00 total) as a Service Award Payment, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the Settlement. Your letter or request must be in writing and must: (a) identify the case name and number (*Jane Doe and Janet Doe v. Missouri Delta Medical Center*, Case No. 23PE-CC00038, pending in the Circuit Court of Pemiscot County, State of Missouri); (b) state the name, current address, telephone number, and Notice ID of the Class Member seeking exclusion; (c) be physically signed by the person(s) seeking exclusion; and (d) contain a statement to the effect that "I hereby request to be excluded from the Settlement Class for purposes of this Settlement." You must mail or deliver your Request for Exclusion no later than November 25, 2026, to:

Missouri Delta Medical Center Settlement
c/o Atticus Administration
P.O. Box 64053
St. Paul, MN 55164

15. If I don't exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself you will not be entitled to any benefits of the Settlement, and you should not submit a Claim Form to ask for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

If you're a Settlement Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file a letter or brief stating that you object to the Settlement in *Jane Doe and Janet Doe v. Missouri Delta Medical Center*, Case No. 23PE-CC00038, pending in the Circuit Court of Pemiscot County, State of Missouri, which must be personally signed, and identify all reasons for your objections. Your letter or brief must include: (a) the name of the proceedings; (b) the Settlement Class Member's full name, address, telephone number (if any), and email address (if any); (c) information identifying the objector as a Settlement Class Member; (d) a written statement of all grounds for the objection, accompanied by any legal support or documentation the objector cares to submit; (e) a statement as to whether the objection applies only to the objector, to a specific subset of the Class, or to the entire Class; (f) the identity of all lawyers (if any) representing the objector; (g) a statement of whether the objector or his/her attorneys intends to appear at the Final Approval Hearing; (h) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection; (i) a list of all other matters in which the objecting Settlement Class Member and/or his/her attorney has lodged an objection to a class action settlement; and (j) the objector's signature. All objections must be submitted to the Claims Administrator, Settlement Class Counsel identified below, and to the Court. Settlement Class Counsel's Motion for Fee Award will be filed with the Court and posted on the Settlement Website. If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer, you must say so in your letter or brief. File the objection with the Court and mail a copy to Settlement Class Counsel and Defendant's counsel postmarked no later than December 28, 2026.

COURT

Clerk's Office
Pemiscot County Circuit Court
610 Ward Ave Ste 2A
Caruthersville, MO 63830

CLASS COUNSEL

Foster C. Johnson
Ahmad, Zavitsanos, & Mensing, PLLC
1221 McKinney, Suite 2500
Houston, Texas 77010

Lynn A. Toops
CohenMalad LLP
One Indiana Square, Suite 1400
Indianapolis, IN 46204

J. Gerard Stranch, IV
Stranch, Jennings & Garvey, PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203

DEFENSE COUNSEL

Jenn O. Hatcher
Shook, Hardy, & Bacon, LLP
2555 Grande Blvd.
Kansas City, MO 64108

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself from the Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing on January 4, 2027, at 9:00 a.m. or as soon as practicable for the Court, at the Pemiscot County Courthouse, 610 Ward Ave Ste 2A, Caruthersville, MO 63830. The hearing may be held remotely, and if so, instructions will be posted on the Settlement Website. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider Settlement Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award Payment to the Settlement Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement. The hearing may be postponed to a different date or time without notice, so it is a good idea to check www.MDMCPixelSettlement.com or call 1-800-870-5147.

20. Do I have to come to the hearing?

No. Settlement Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay for your own lawyer to attend, but it's not required.

21. 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 include in your letter or brief objecting to the Settlement a statement saying that it is your "Notice of Intent to Appear in *Jane Doe and Janet Doe v. Missouri Delta Medical Center*, Case No. 23PE-CC00038, pending in the Circuit Court of Pemiscot County, State of Missouri." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than December 28, 2026, and be sent to the addresses listed in Question 17.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.MDMCPixelSettlement.com. You may also write with questions to the MDMC Claims Administrator, c/o Atticus Administration, P.O. Box 64053, St. Paul, MN 55164. You can call the Claims Administrator at 1-800-870-5147 or Settlement Class Counsel at 713-600-4915 if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the Court's website.