

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Mrozinski, et al. v. Aspirus, Inc.

Case No. 2023CV000170

Circuit Court of Marathon County, Wisconsin

IF YOU LOGGED IN TO YOUR ASPIRUS PATIENT PORTAL ACCOUNT ANY TIME BETWEEN JANUARY 1, 2019, AND DECEMBER 31, 2024, A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO A CASH PAYMENT.

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

You are not being sued.

Please read this Notice carefully and completely.

- A Settlement has been reached with the Aspirus, Inc. (“Aspirus” or “Defendant”) in a class action lawsuit. This class action lawsuit alleged that Aspirus misused some of the private data it collected about its patients.
- The lawsuit is called *Mrozinski, et al. v. Aspirus, Inc.*, Case No. 2023CV000170, pending in the Circuit Court of Marathon County, Wisconsin (the “Litigation”).
- Aspirus denies that it did anything wrong, and the Court has not decided who is right.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the litigation.
- Your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive a cash payment is by submitting a valid and timely Claim Form. The fastest way to submit your Claim Form is online at www.AspirusDataSettlement.com. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.	December 3, 2025
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.	November 3, 2025
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.	November 3, 2025
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to grant final approval of this Settlement.

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Basic Information

1. Why was this Notice issued?

The Circuit Court of Marathon County, Wisconsin, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Mrozinski, et al. v. Aspirus, Inc.*, Case No. 2023CV000170, pending in the Circuit Court of Marathon County, Wisconsin. The people that filed this lawsuit are called the “Plaintiffs” (or “Class Representatives”) and the company they sued, Aspirus, Inc., is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that Aspirus misused some of the private information it collected about its patients when they logged into their patient portals. The Plaintiffs say that Aspirus shared this personally identifiable information with Meta (which owns Facebook and Instagram), and other third parties, in a way that violates certain Wisconsin laws. Aspirus firmly denies that it did anything wrong, and has agreed to the settlement to avoid the expense, burden, and uncertainties associated with continuing the litigation. The Court has not decided who is right.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representatives are Randy Mrozinski, Tammy Lowell, and Marc Blazich, and everyone included in this Action are the Settlement Class Members.

4. Why is there a Settlement?

The Court did not decide whether the Plaintiffs or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Settlement Class Members to receive benefits from the Settlement. Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

Who is in the Settlement?

5. Who is included in the Settlement?

The court has defined the Settlement Class as: “All patients of Aspirus residing in the United States who had a patient portal account with Aspirus and logged in between January 1, 2019 through December 31, 2024.”

6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s family and staff; (2) Aspirus and its officers and directors; (3) Class Counsel (**see Question 12**); (4) anyone who validly excludes themselves from the Settlement; and (5) the legal representatives, successors or assigns of such excluded Persons.

If you are not sure whether you are a Settlement Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@AspirusDataSettlement.com
- Call toll free, 24/7: 1-(844) 496-0917
- By mail: Aspirus Privacy Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799.

You may also view the Settlement Agreement at www.AspirusDataSettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Aspirus will pay for two benefits, both of which are available to every Settlement Class Member.

CASH PAYMENT. All Class Members can claim a one-time **\$22.00** cash payment.

PRIVACY SHIELD PRO. All Class Members may enroll in one year of services from **Privacy Shield Pro**, a comprehensive privacy protection solution offered by CyEx. This service includes:

- Dark Web Watchlist
- Password Scan
- Password Defense
- VPN In Touch
- Private Search functionality
- Data Broker Opt-Out services
- Digital Vault

An enrollment code for Privacy Shield Pro was emailed to all Class Members. If you did not receive that email, or no longer have it, please contact the Settlement Administrator.

Instructions for enrolling will be sent after the court gives final approval to the Settlement (**see Question 18**).

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@AspirusDataSettlement.com
- Call toll free, 24/7: 1-(844) 496-0917
- By mail: Aspirus Privacy Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799.

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

If you stay in the class, you won't be able to be part of any other lawsuit against Aspirus about the issues that this Settlement covers. The "Release" sections of the Settlement Agreement (Paragraphs 1.24–1.26, and 3.1–3.2) describe the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.AspirusDataSettlement.com.

Submitting a Claim Form for a Settlement Payment

9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at www.AspirusDataSettlement.com. If you prefer, you can download the Claim Form from the website and mail it to the Settlement Administrator at:

**Aspirus Privacy Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799**

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, **(844) 496-0917**, by email info@AspirusDataSettlement.com, or by U.S. mail at the address above.

10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **December 3, 2025**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than **December 3, 2025**.

11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 18, 2025, at 10:00am CT** (**see Question 18**). If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys David S. Almeida of Almeida Law Group LLC, Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman PLLC, Raina Borrelli of Strauss Borrelli PLLC, and Foster C.

Johnson of Ahmad, Zavitsanos, & Mensing, PLLC, to represent you and other Class Members (“Class Counsel”).

13. Should I get my own lawyer?

You will not be charged for Class Counsel’s services. If you want your own lawyer, you may hire one at your expense.

14. How will Class Counsel be paid?

Class Counsel will ask the court to approve a payment of \$1,500,000.00 in attorney’s fees, costs, and expenses, which if approved will be paid by Aspirus.

Class Counsel will also ask for Service Award of \$2,500.00 for each of the Class Representatives. If approved the Service Award will also be paid by Aspirus.

Excluding Yourself from the Settlement

15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called “opting out.” If you opt out, you will not receive a Settlement payment, but you will keep any rights you may have to sue Aspirus on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **November 3, 2025**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Action: *Mrozinski, et al. v. Aspirus, Inc.*, Case No. 2023CV000170, pending in the Circuit Court of Marathon County, Wisconsin;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words “Request for Exclusion” or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

Aspirus Privacy Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Your Request for Exclusion must be submitted, postmarked, or emailed by **November 3, 2025**.

Commenting on or Objecting to the Settlement

16. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Action: *Mrozinski, et al. v. Aspirus, Inc.*, Case No. 2023CV000170, pending in the Circuit Court of Marathon County, Wisconsin;
- (2) your full name, mailing address, telephone number, and email address;
- (3) a clear description of all the reasons you object; include any legal support you may have for your objection;
- (4) if you have hired your own lawyer to represent you at the Final Approval Hearing, provide their name and contact information;
- (5) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (6) if you or your lawyer have objected in any other cases in the past three years, list the names, courts, and civil action numbers for each of those cases;
- (7) your signature (or, if you have hired your own lawyer, your lawyer's signature).

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **November 3, 2025**. You must also send copies of the objection to Class Counsel and counsel for Defendants.

Clerk of the Court	Class Counsel	Counsel for Defendants
Clerk of the Court Marathon County Circuit Court 500 Forest St Wausau, WI 54403	Raina Borrelli Strauss Borrelli PLLC 98 N. Michigan Avenue Suite 1610 Chicago, IL 60611	Michelle R. Gomez Baker & Hostetler LLP 1801 California Street Suite 4400 Denver, CO 80202

17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

The Court's Final Approval Hearing

18. When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **November 18, 2025, at 10:00am Central Time** via Zoom to consider whether to approve the Settlement. The Zoom link is <https://wicourts.zoom.us/j/3402455577> and the Meeting ID is 340 245 5577.

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award Service Award to the Class Representatives who brought this Action on behalf of the Class. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**).

The date and time of this hearing may change without further notice. Please check **www.AspirusDataSettlement.com** for updates.

19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

If I Do Nothing

20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

Getting More Information

21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, **www.AspirusDataSettlement.com**.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@AspirusDataSettlement.com
- Call toll free, 24/7: 1-(844) 496-0917
- By mail: Aspirus Privacy Settlement, c/o Settlement Administrator, P.O. Box 25226, Santa Ana, CA 92799

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Circuit Court of Marathon County, Wisconsin, at 500 Forest St, Wausau, WI 54403.