

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Superior Court of Hillsborough County, New Hampshire

Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H., Case No. 226-2025-CV-00138

If you used a MyChart patient portal account associated with St. Joseph Hospital of Nashua, N.H. from January 1, 2023, through the applicable period, you may be eligible for a payment from a Class Action Settlement.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A proposed Settlement has been reached with St. Joseph Hospital of Nashua, N.H., the “Defendant” or “St. Joseph,” in a class action lawsuit. The lawsuit alleges the Defendant unlawfully collected, used, and disclosed personally identifiable information and protected health information of persons who used a MyChart patient portal account. The Defendant denies these allegations and denies all wrongdoing.
- You are included in this Settlement if you used a MyChart patient portal account associated with St. Joseph from January 1, 2023, through the applicable period.
- Under the proposed Settlement, the Defendant will provide a \$50 payment to Settlement Class Members with valid claims. The Defendant will separately pay Notice and Settlement Administrative Costs and the court-approved Attorney’s Fees and Expenses and Service Awards.
- As a Settlement Class Member, your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
File a Claim	The only way to receive a Settlement Payment is to submit a valid and timely Claim Form.	August 14, 2026
Opt Out of the Settlement	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant about the claims resolved by this Settlement. You will not receive any benefits from the Settlement.	July 30, 2026
Object to the Settlement and/or Attend a Hearing	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still file a Claim.	July 30, 2026
Do Nothing	If you do nothing, you will remain a Settlement Class Member and 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. You will not receive any benefits from the 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 must decide whether to approve the Settlement.
- Payments will only be made if the Court approves the Settlement and after appeals, if any, are resolved.

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BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this Litigation and about all your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Litigation, your legal rights, what benefits are available, and who can receive them.

The Litigation is called *Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H.*, Case No. 226-2025-CV-00138 and is pending in the Superior Court of Hillsborough County, New Hampshire. The people who filed this class action lawsuit are called the “Plaintiffs” and the company they sued, St. Joseph Hospital of Nashua, N.H., is called the “Defendant.”

2. What is this Litigation about?

A proposed Settlement has been reached with the Defendant in a class action lawsuit that alleges that the Defendant unlawfully collected, used, and disclosed personally identifiable information and personal health information from persons who visited the MyChart patient portal. The Litigation alleges that the Defendant used the collected information to target individuals with marketing based on their sensitive health information and website interactions.

The Defendant denies these allegations and denies any and all wrongdoing.

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 who sue are known as “Settlement Class Representatives” or Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” A court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement.

In this case, the Class Representatives are: Theresa Fiorillo, Charlene Areche, and Julie Hayden.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that it has not violated any laws. The Plaintiffs and Defendant agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim a payment and benefit more quickly. The Plaintiffs and their attorneys, who also represent the Settlement Class, believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all persons who used a MyChart patient portal account associated with St. Joseph from January 1, 2023, through the applicable period.

6. Are there exceptions to being included in the Settlement?

Yes, excluded from the Settlement Class are: (1) the judge presiding over the Litigation, the judge’s staff, and members of the judge’s direct family; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parent companies have a controlling interest and their current or former officers and directors; and (3) Class Members who submit a valid Request for Exclusion prior to the Opt-Out Date.

THE SETTLEMENT CLASS MEMBER BENEFITS

7. What does the Settlement provide?

If approved by the Court, the Defendant will pay each Settlement Class Member who submits a valid and timely Claim \$50 to resolve the Litigation. The Defendant also has agreed to pay separately court-approved Attorneys' Fees and Expenses, the Service Awards, and Settlement Notice and Administration Costs.

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

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims "released" by this Settlement, as described in Section XV of the Settlement Agreement. The Release section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.stjosephpixelsettlement.com.

HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS – MAKING A CLAIM

9. How do I submit a Claim Form?

To file a Claim, you must submit a valid Claim Form by **August 14, 2026**. Claim Forms may be submitted online at www.stjosephpixelsettlement.com by 11:59 p.m. ET, or downloaded from the Settlement Website and sent by U.S. Mail, postmarked by **August 14, 2026**, to the Settlement Administrator at:

Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H.
c/o Kroll Settlement Administration LLC
ATTN: Claims
P.O. Box 225391
New York, NY 10150-5391

10. When will I get my Settlement Payment?

You will receive your Settlement Payment after the Settlement is "finally approved" and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **September 14, 2026, at 2:00 p.m. ET**, to decide whether to approve the Settlement, how much Attorneys' Fees and Expenses to award Class Counsel for representing the Settlement Class, and the amount of the Service Awards to the Class Representatives who brought this Litigation on behalf of the Settlement Class.

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 Payments will be distributed as soon as possible—if the Court grants Final Approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

Yes, the Court appointed Katrina Carroll and Kyle Shamberg of Carroll Shamberg LLC to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will be paid separately by the Defendant (subject to Court approval). If you want to be represented by your own lawyer, you may hire one at your own expense.

Katrina Carroll (katrina@csclassactions.com)
Kyle Shamberg (<mailto:kyle@csclassactions.com>)
CARROLL SHAMBERG LLC
200 N. LaSalle Street Suite 1650
Chicago, IL 60601

12. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

Class Counsel will ask the Court to approve Attorneys' Fees and Expenses up to \$1,250,000, which are to be paid separately from the Settlement Payments to Settlement Class Members who submit valid Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out." The Opt-Out Date to submit a "Request for Exclusion" from the Settlement is **July 30, 2026**.

To exclude yourself from the Settlement, you must submit a written Request for Exclusion to the Settlement Administrator that includes the following information:

- Your full name, current address, and telephone number;
- A statement indicating that you want to be excluded from the Settlement Class, such as "I hereby request to be excluded from the proposed Settlement Class in *Fiorillo, et al. v. St. Joseph Hospital of Nashua, N.H.*, Case No. 226-2025-CV-00138" and request exclusion only for yourself;
- Your personal, original signature or e-signature.

Your Request for Exclusion must be submitted online through the Settlement Website, or mailed to the Settlement Administrator postmarked by **July 30, 2026**, at:

Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H.
c/o Kroll Settlement Administration LLC
ATTN: Exclusions
P.O. Box 225391
New York, NY 10150-5391

OBJECTING TO THE SETTLEMENT

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

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for Attorneys' Fees and Costs, the Service Award payments, the Releases provided to the Defendant, the fairness, reasonableness or adequacy of the Settlement, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement. The Court can only approve or reject the Settlement. If the Court denies approval, no Settlement Payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you may object.

For an objection to be considered by the Court, the objection must include:

- The case name and number, "*Fiorillo, et al. v. St. Joseph Hospital of Nashua, N.H.*, Case No. 226-2025-CV-00138;"
- The Settlement Class Member's full name, address, telephone number, and email address;

- If you are represented by an attorney, or had an attorney’s help in drafting your objection, the attorney’s full name, address, telephone number, and email address;
- A statement indicating the basis for why you think you are a Settlement Class Member;
- A statement about whether the objection only applies only to you, to a specific subset of the Settlement Class, or to the Settlement Class as a whole;
- The specific factual and legal grounds for the objection;
- A statement about whether you intended to appear in person at the Final Approval Hearing and, if so, whether personally or through counsel;
- If you or your attorney intend to appear at the Final Approval Hearing, your written objection must include the identity of any witnesses you intend to call to testify, a description and copies of any documents or evidence you intend to offer, and a list (including case name, court, and docket number) of all other cases in which you or your counsel has filed an objection to any proposed class action settlement in the past three (3) years; and
- Your personal, original signature or e-signature.

Objections must be submitted by 11:59 p.m. ET on July 20, 2026, at www.stjosephpixelsettlement.com if filing online, or sent by U.S. Mail, postmarked no later than July30, 2026, to:

Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H.
 c/o Kroll Settlement Administration LLC
 ATTN: Objections
 P.O. Box 225391
 New York, NY 10150-5391

16. What is the difference between objecting and opting out?

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 it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT’S FINAL APPROVAL HEARING

17. When is the Court’s Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **September 14, 2026, at 2:00 p.m. ET**, at the Superior Court of New Hampshire, Hillsborough County South, 30 Spring Street, Nashua, N.H. 03060, to decide whether to approve the Settlement, how much Attorneys’ Fees and Expenses to award to Class Counsel for representing the Settlement Class, and whether to approve the Service Awards to the three Class Representatives who brought this Action on behalf of the Settlement Class, collectively not to exceed \$1,250,000. The date and time of this hearing may change without further notice. Please check www.stjosephpixelsettlement.com for updates.

18. 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 file an objection, you may but do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time including the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Release in the Settlement and will not be eligible to receive a Settlement Payment.

GETTING MORE INFORMATION

20. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.stjosephpixelsettlement.com. If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (833) 447-5977, or by mail:

Fiorillo, et al., v. St. Joseph Hospital of Nashua, N.H.
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

PLEASE DO NOT CONTACT THE COURT OR THE DEFENDANT FOR MORE INFORMATION ABOUT THIS SETTLEMENT.