



## Circuit Court for Shelby County, Tennessee

*Jane Doe v. AMISUB (SFH), Inc.*

*d/b/a Saint Francis Hospital-Memphis*

Case No. CT-3086-23

### NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

**IF YOU VISITED TENET HEALTHCARE CORPORATION WEBSITES OR  
ACCESSED THE PATIENT PORTAL BETWEEN JANUARY 1, 2017, AND  
SEPTEMBER 18, 2023, A PROPOSED CLASS ACTION SETTLEMENT  
MAY AFFECT YOUR RIGHTS, AND ENTITLE YOU TO BENEFITS AND 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 Tenet Healthcare Corporation (“Tenet Healthcare” or “Defendant”) in a class action lawsuit. This lawsuit concerned Tenet Healthcare’s use of third-party tracking technologies, called “tracking pixels,” on its web pages. The plaintiff claims that using tracking pixels violated certain privacy laws.
- The lawsuit is called *Jane Doe v. AMISUB (SFH), Inc. d/b/a Saint Francis Hospital-Memphis*, Case No. CT-3086-23. It is pending in the Circuit Court for Shelby County, Tennessee (the “Litigation”).
- Tenet Healthcare 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.
- Tenet Healthcare's records indicate that you may be a Class Member, and may be entitled to benefits under the Settlement. You may have received a previous notice directly from Tenet Healthcare.
- 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                 |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>SUBMIT A CLAIM</b>                                       | <p>The only way to receive benefits or payments from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.TenetPixelSettlement.com">www.TenetPixelSettlement.com</a>. 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.</p> | <b>March 15, 2027</b>    |
| <b>OPT OUT OF THE SETTLEMENT</b>                            | You can choose to opt out of the Settlement and receive no benefit or payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.                                                                                                                                                                                                     | <b>December 21, 2026</b> |
| <b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>     | 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.                                                                                                                                                                                           | <b>December 21, 2026</b> |
| <b>DO NOTHING</b>                                           | Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments 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 approve the Settlement.

## WHAT THIS NOTICE CONTAINS

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## Basic Information

### 1. Why was this Notice issued?

The Circuit Court for Shelby County, Tennessee, 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 *Jane Doe v. AMISUB (SFH), Inc. d/b/a Saint Francis Hospital-Memphis*, Case No. CT-3086-23. It is pending in the Circuit Court for Shelby County, Tennessee. The people that filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Tenet Healthcare Corporation, is called the "Defendant."

### 2. What is this lawsuit about?

This lawsuit alleges that Tenet Healthcare used third-party tracking technologies, often called "tracking pixels," on its website in a way that violates certain privacy laws. Tenet Healthcare denies that it did anything wrong.

### 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 Melissa Alvarez; Karen Beauregard; Lori Woolhouse; Cory Burns; Colleen Burns; George Demiter; Blake Busson; Sidney Cauthen; Heather DeLano; Patricia Flores; Jacqueline Hillie; Michael L. Johnson, Sr.; Romanda Williams Johnson; Jennifer Mathis; Robert Oldham; Tiffany Rodriguez; Jonathan Schmid; Latonya Williams; Barbara-Ann Klickstein; Nancy Zide; Lisa Danforth; Tammy Newman; Victoria Randolph; Michael Johnson; Lori Beltran; Brittany Matus; Mark Mehring; and Judith Harrill. Everyone included in this Action are the 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 Class Members to receive benefits from the Settlement. The Plaintiffs and their attorney think the Settlement is best for all Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class this way: “All Identifiable Individuals that used or accessed the Online Platforms during the Class Period.”

“Identifiable Individual” means an individual who during the Class Period used any website or patient portal owned or operated by Tenet Healthcare, any of its affiliated covered entities, or former affiliated covered entities to (i) create a patient portal account; (ii) submit a webform; or (iii) check in to an urgent care or emergency room during the Class Period.

“Online Platforms” means the websites, patient portals, the Healthlife app, and other web-based tools and services operated by or on behalf of Defendant.

“Class Period” is from January 1, 2017, through September 18, 2023.

### 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) Tenet Healthcare and its officers, directors, and related companies; (3) anyone who validly excludes themselves from the Settlement; and (4) attorneys for the parties.

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

- Email: [info@TenetPixelSettlement.com](mailto:info@TenetPixelSettlement.com)
- Call toll free, 24/7: (833) 296-0729
- By mail: Tenet Healthcare Pixel Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at [www.TenetPixelSettlement.com](http://www.TenetPixelSettlement.com).

## The Settlement Benefits

### 7. What does the Settlement provide?

Tenet Healthcare has agreed to pay for two benefits that are available to all Class Members.

You may file a claim for one or both of these benefits.

#### **BENEFITS**

**CyEx Privacy Shield Pro.** All Class Members are eligible to enroll in two years of CyEx Privacy Shield Pro. Enrollment codes have been sent to all Class Members by postcard. If you no longer have your enrollment code, please contact the Settlement Administrator.

This comprehensive service is designed to restore users' privacy and anonymity, and includes:

- Dark Web scanning
- compromised password scanning
- VPN, password manager, and other online privacy tools

If anything suspicious happens, you will be able to talk to a fraud resolution agent to help fix any problems.

**Cash Payment.** All Class Members are eligible to claim a one-time **\$16.00** cash payment. You do not have to provide any proof or explanation to claim this payment.

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

- Email: [info@TenetPixelSettlement.com](mailto:info@TenetPixelSettlement.com)
- Call toll free, 24/7: (833) 296-0729
- By mail: Tenet Healthcare Pixel Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

## 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 Tenet Healthcare about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section 3) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.TenetPixelSettlement.com](http://www.TenetPixelSettlement.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.TenetPixelSettlement.com](http://www.TenetPixelSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

Tenet Healthcare Pixel Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (833) 296-0729, by email [iinfo@TenetPixelSettlement.com](mailto:iinfo@TenetPixelSettlement.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 **March 15, 2027**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form must be postmarked no later than **March 15, 2027**.

## 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **January 14, 2027 (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 attorney J. Gerard Stranch, IV of Stranch, Jennings & Garvey, 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 \$8,500,000.00 as reasonable attorney's fees and reimbursement of litigation costs. This amount will be paid by Tenet Healthcare.

Class Counsel will also ask for Service Award payments of \$3,500.00 for each of the Class Representatives. Service Award payments will also be paid by Tenet Healthcare.

## 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 Settlement benefits or payment. However, you will keep any rights you may have to sue Tenet Healthcare 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 **December 21, 2026**.

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

- (1) the name of the Litigation: *Jane Doe v. AMISUB (SFH), Inc. d/b/a Saint Francis Hospital-Memphis*, Case No. CT-3086-23, pending in the Circuit Court for Shelby County, Tennessee;
- (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:

Tenet Healthcare Pixel Settlement  
ATTN: Exclusion Request  
P.O. Box 25226  
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **December 21, 2026**.

## 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 Litigation: *Jane Doe v. AMISUB (SFH), Inc. d/b/a Saint Francis Hospital-Memphis*, Case No. CT-3086-23, pending in the Circuit Court for Shelby County, Tennessee;
- (2) your full name, mailing address, telephone number, and email address;
- (3) information that proves that you are a Class Member (such as a notice you have received);
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (6) whether or not you or your lawyer would like to speak at the Final Approval Hearing;
- (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 **December 21, 2026**. You must also send a copy of the objection to the Settlement Administrator, Class Counsel, and counsel for Defendants.

| Clerk of the Court                                                                                                                 | Settlement Administrator                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Clerk of the Court<br>140 Adams Avenue, Room 324<br>Memphis, TN 38103                                                              | Tenet Healthcare Pixel Settlement<br>ATTN: Objections<br>P.O. Box 25226<br>Santa Ana, CA 92799-9958                                  |
| Class Counsel                                                                                                                      | Counsel for Defendants                                                                                                               |
| J. Gerard Stranch, IV<br><b>STRANCH, JENNINGS &amp; GARVEY, PLLC</b><br>223 Rosa L. Parks Avenue, Suite 200<br>Nashville, TN 37203 | Scott A. Elder<br><b>ALSTON &amp; BIRD LLP</b><br>One Atlantic Center<br>1201 West Peachtree Street, Suite 4900<br>Atlanta, GA 30309 |

## 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 on **January 14, 2027 at 10:00 a.m. Central Time**, of the Circuit Court for Shelby County, Tennessee, at 140 Adams Avenue, Room 324, Memphis, TN 38103.

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 payments to the Class Representatives. 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.TenetPixelSettlement.com](http://www.TenetPixelSettlement.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.TenetPixelSettlement.com](http://www.TenetPixelSettlement.com).

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

- Email: [info@TenetPixelSettlement.com](mailto:info@TenetPixelSettlement.com)
- Call toll free, 24/7: (833) 296-0729
- By mail: Tenet Healthcare Pixel Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, 140 Adams Avenue, Room 324, Memphis, TN 38103.

**DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT**