

If your **information** was disclosed to a third party between February 19, 2020 and July 22, 2026 through Tracking Technologies on Wellstar Health System, Inc.'s website and patient portal, you may be entitled to a *pro rata* cash payment from a Settlement.

Court-Approved Notice of Settlement. You may be eligible for a cash payment from a **\$4,250,000 class action settlement** involving Wellstar Health System, Inc. ("Defendant"). Plaintiffs allege that Defendant disclosed Settlement Class Members' personally identifiable information and protected health information to third parties including, but not limited to, Meta Platforms, Inc. d/b/a Meta and Google LLC via tracking pixels, cookies, and other tracking technologies installed on Defendant's website and patient portal (the "Web Properties").

Defendant denies the allegations in the lawsuit and has agreed to settle the lawsuit, *Doe v. Wellstar Health System, Inc.*, Case No. 1:24-cv-01748, United States District Court for the Northern District of Georgia. The Court has not decided which party is right.

- **Settlement Class:** You are a member of the Settlement Class if you are a person residing in the United States whose information was disclosed to a third party between February 19, 2020, and July 22, 2026 through Tracking Technologies on Wellstar's Web Properties.
- **Submit a Claim:** If you are a member of the Settlement Class, you can submit a Claim online or by mail postmarked by **November 10, 2026**, to receive:

A *pro rata* (a legal term meaning equal share) cash payment from the Settlement.

The amount of your cash payment will be determined after deducting Notice and Settlement Administration Costs and all Court-approved Service Awards and Attorneys' Fees and Expenses Awards from the Settlement Fund.

Your Legal Rights & Options	Important Dates
Submit a Claim: You must submit a Claim to receive a <i>pro rata</i> (a legal term meaning equal share) cash payment from the Settlement.	Submit or postmarked by: November 10, 2026
Opt-Out: You may submit an opt-out if you do not want to be part of the Settlement Class. The Court will exclude Settlement Class Members who request to opt-out.	Postmarked by: October 26, 2026
Object: You may object to the Settlement if you do not opt-out.	File by: October 26, 2026
Do Nothing: You will get no cash payment from the Settlement, and you will be bound by the Settlement and any orders or judgments.	
Final Approval Hearing: The Court will decide whether to approve the Settlement, Class Counsel's attorneys' fees and costs, Service Awards, and any objections.	Final Approval Hearing: December 1, 2026



LEARN MORE

Scan this QR code, call toll-free 1-877-417-7863
or visit www.WellstarDataPrivacySettlement.com

NOTICE OF CLASS ACTION SETTLEMENT

1. Why is this notice being provided?

This notice explains that a settlement was reached in a class action lawsuit called *Doe v. Wellstar Health System, Inc.*, Case No. 1:24-cv-01748, United States District Court for the Northern District of Georgia, being handled by Judge J.P. Boulee.

The individuals who filed this lawsuit are called the “Plaintiffs” or “Class Representatives” and the company they filed a lawsuit against, Wellstar Health System, Inc., is called the “Defendant.” Defendant denies it did anything wrong. The Court has not decided who is right or wrong. Instead, the Plaintiffs and Defendant have agreed to a settlement for the class action lawsuit.

2. What is the Settlement about?

A \$4,250,000 class action settlement was reached in a class action lawsuit involving Defendant.

Plaintiffs allege that Defendant disclosed Settlement Class Members’ personally identifiable information and protected health information (“Private Information”) to third parties including, but not limited to, Meta Platforms, Inc. d/b/a Meta and Google LLC via tracking pixels, cookies, and other tracking technologies (“Tracking Technologies”) installed on Defendant’s website and patient portal (“Web Properties”). Plaintiffs allege that Defendant’s implementation and usage of the Tracking Technologies resulted in the invasion of Plaintiffs’ and Settlement Class Members’ privacy.

3. Why is this lawsuit a class action?

In a class action, one or more people (called class representatives) file a lawsuit for others who have the same legal claims. Together, these people are called a “class” or “class members.” One court resolves the issues for all class members, except for those class members who opt-out of the class by the deadline.

Settlement Class

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

You are a member of the Settlement Class if you are a person residing in the United States whose information was disclosed to a third party between February 19, 2020, and July 22, 2026 through Tracking Technologies on Wellstar’s Web Properties.

5. Are there exceptions to being included in the Settlement Class?

Yes, the Settlement Class excludes: (a) any Judge presiding over this Action, any members of the Judges’ respective staffs, and immediate members of the Judge’s family; (b) officers and directors of the Defendant, its agents, affiliates, subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest; (c) persons who timely and validly request exclusion from or opt-out of the Settlement Class; (d) the legal representatives, successors, or assigns of any such excluded persons; and (e) Class Counsel.

6. What if I am still not sure if I am a member of the Settlement Class?

If you are still not sure if you are a member of the Settlement Class, you may go to www.WellstarDataPrivacySettlement.com or call toll-free 1-877-417-7863 for more information.

Settlement Benefits

7. What does the Settlement provide?

Defendant has agreed to pay \$4,250,000 into a Settlement Fund. This money will be used to provide *pro rata* (a legal term meaning equal share) cash payments to members of the Settlement Class who submit a Claim. You must submit your Claim before the deadline and your Claim must be considered valid to receive a cash payment.

Any residual funds remaining in the Net Settlement Fund after distribution of the cash payments will be issued to Good Samaritan Health Center of Cobb, subject to Court approval.

8. What can I get from the Settlement?

If you are a member of the Settlement Class, you may submit a Claim to receive a *pro rata* (a legal term meaning equal share) cash payment.

The amount of your cash payment will be determined after deducting Notice and Settlement Administration Costs and all Court-approved Service Awards and Attorneys' Fees and Expenses Awards from the Settlement Fund.

Submit a Claim

9. How do I submit a Claim?

You can submit a Claim online or by mail. A Claim Form is also available at www.WellstarDataPrivacySettlement.com or by calling 1-877-417-7863 or by writing to the address for mailing your Claim:

Option 1 – Submit Online



Complete and submit your Claim by **November 10, 2026**.
Scan the QR code or go to: www.WellstarDataPrivacySettlement.com.



Option 2 – Submit by Mail



Complete and submit your Claim by mail, **postmarked** by **November 10, 2026**, and mailed to:

Wellstar Pixel Settlement
Settlement Administrator
PO Box 2197
Portland, OR 97208-2197

10. What happens if my contact information changes?

If your mailing address or email address changes, please send your new contact information in writing to:

Wellstar Pixel Settlement
Settlement Administrator
PO Box 2197
Portland, OR 97208-2197

11. When will I receive a cash payment from the Settlement?

Pro rata (a legal term meaning equal share) cash payments from the Settlement will be provided after the Settlement is approved by the Court. This may take time. Please check www.WellstarDataPrivacySettlement.com for updates.

Release

12. What am I giving up to receive a cash payment or stay in the Settlement Class?

If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. This means you will not be able to continue or be part of any other lawsuit against the Released Parties about the Released Claims in this lawsuit. A release means you are giving up your right to be part of a different lawsuit against the Released Parties for the legal issues covered by the Settlement.

Section X of the Settlement Agreement describes the Releases in necessary legal terminology, so please read that information carefully. The Settlement Agreement is available at www.WellstarDataPrivacySettlement.com. If you have questions about the Releases and what the language in the Settlement Agreement means, you can contact Class Counsel listed below for free, or you can talk to your own lawyer at your own cost.

Opt-Out of the Settlement Class

13. What happens if I opt-out of the Settlement Class?

You may opt-out of the Settlement Class and the Court will exclude you. If you do not want to be included in the Settlement Class, you must opt-out.

If you opt-out:

- **You will not receive a cash payment from the Settlement.**
- You cannot object to the Settlement; and
- The Settlement and any judgments will *not* apply to you. You will keep your legal right to be part of another lawsuit about the legal claims against the Released Parties involved in the Settlement.

14. How do I opt-out of the Settlement Class?

To opt-out of the Settlement Class, you must mail a written request and include the following information:

- 1) Your name, address, and telephone number;
- 2) Your personal signature; and
- 3) A statement that you want to opt-out of the Settlement Class, such as "I want to opt-out of the Settlement Class in *Doe v. Wellstar Health System, Inc.*, Case No. 1:24-cv-01748, United States District Court for the Northern District of Georgia."

Your opt-out must be **postmarked** by **October 26, 2026**, and **mailed** to:

Wellstar Pixel Settlement
Opt-Out
PO Box 2197
Portland, OR 97208-2197

You cannot opt-out of the Settlement Class by telephone or by email.

“Mass” opt-outs are opt-outs submitted for multiple Settlement Class Members by a third-party. Mass opt-outs will not be allowed.

15. If I opt-out of the Settlement Class, will I get anything from the Settlement?

No. If you opt-out of the Settlement Class, you will not receive anything from the Settlement. The Settlement will not apply to you, and you will not be bound by it or any judgments. **If you want to receive a cash payment from the Settlement, do not opt-out of the Settlement Class.**

16. If I opt-out of the Settlement by mistake, can I still submit a Claim?

Yes. You may submit a Claim. Please contact the Settlement Administrator to confirm that you want to **withdraw your request to opt-out** and you want to submit a Claim. If you do not withdraw your request to opt-out, you will be excluded and will not receive a cash payment from the Settlement.

17. If I do not opt-out of the Settlement Class, can I file a lawsuit for the same thing later?

No. You will give up your right to be part of a lawsuit against the Defendant and Released Parties for the legal claims involved in this Settlement. You will be bound by the Settlement, orders, and judgments in the lawsuit.

Object to the Settlement

18. How do I tell the Court I do not like the Settlement?

As a member of the Settlement Class, you can file an objection to tell the Court you do not like any part of the Settlement. The Court can only approve or deny the current Settlement. If the Court does not approve the Settlement, no cash payments will be provided.

To object, you must file a written objection with the Court. Your objection must state that you object to the Settlement in *Doe v. Wellstar Health System, Inc.*, Case No. 1:24-cv-01748, and must include the following information:

- 1) Your full name, current address, telephone number, and email address;
- 2) If you are represented by a lawyer, or received assistance from a lawyer in drafting your objection, the name, address, telephone number, and email address of the lawyer;
- 3) The basis for your belief that you are a Settlement Class Member (e.g., including your Settlement Class Member Unique ID);
- 4) If your objection applies to you only, part of the Settlement Class, or the entire Settlement Class;
- 5) The legal and/or factual basis for your objection;
- 6) A list, including the case name, court, and docket number, of all other cases in which you as the objector or your lawyer has filed an objection to any proposed class action settlement in the past three (3) years;
- 7) State whether you intend to appear at the Final Approval Hearing and if so, whether personally or through your lawyer;
- 8) If you or your lawyer intend to appear, the identity of witnesses whom you intend to call to testify at the Final Approval Hearing and a description of any documents or evidence that you intend to offer at the Final Approval Hearing; and
- 9) Your signature as the objector. A lawyer's signature alone is not adequate.

To object, you must file a written objection with the Court so it is **received** by **October 26, 2026**. You must also send your objection to Class Counsel, Defendant's Counsel, and the Settlement Administrator **postmarked** by **October 26, 2026**, via US Mail to:

Court	Clerk U.S. District Court Richard B. Russell Federal Building 2211 United States Courthouse 75 Ted Turner Dr, SW Atlanta, GA 30303
Class Counsel	David Almeida Britany Wessan Almeida Law Group LLC 849 W. Webster Ave Chicago, IL 60614 Brandon Wise Andrew Tate Peiffer Wolf Carr Kane Conway & Wise LLP One US Bank Plaza, Suite 1950 St. Louis, MO 63101 C.J. Cuneo Milberg LLC 227 W. Monroe St., Suite 2100 Chicago, IL 60606
Defendant's Counsel	Josh Becker Shook, Hardy & Bacon LLP 1230 Peachtree St NE #1200 Atlanta, GA 30309
Settlement Administrator	<i>Wellstar Pixel Settlement</i> Settlement Administrator PO Box 2197 Portland, OR 97208-2197

Opt-Outs & Objections

19. What is the difference between opting out of the Settlement Class and objecting to the Settlement?

Opting out is telling the Court you do not want to be in the Settlement Class. If you opt-out of the Settlement Class, you cannot object or submit a Claim because you are no longer part of the Settlement Class, and the Settlement does not apply to you.

Objecting is telling the Court you do not like something about the Settlement. You can object only if you stay in the Settlement Class and you do not opt-out of the Settlement Class. If you object, you can submit a Claim because you are still part of the Settlement Class.

Postmark Deadlines

20. What do I need to know about postmark deadlines?

Please note that per the United States Postal Service, mail may *not* be postmarked the day it is put in a mailbox or dropped off at a local post office. Postmarks occur when mail reaches a processing facility.

To meet a postmark deadline, it is recommended that you **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

Do Nothing

21. What happens if I do nothing?

If you do nothing, you will stay in the Settlement Class, and the Settlement will apply to you. You must submit a Claim to receive a cash payment from the Settlement. If you do nothing, you will be legally bound by the Court's orders and judgments.

22. As a member of the Settlement Class, do I have a lawyer in the lawsuit?

Yes. For a class action lawsuit, a judge selects lawyers called "Class Counsel" to handle the lawsuit for all class members. For this lawsuit, the Court selected lawyers David Almeida and Brittany Wessan of Almeida Law Group LLC, Brandon Wise and Andrew Tate of Peiffer Wolf Carr Kane Conway & Wise, LLP, and C.J. Cuneo of Milberg LLC as Class Counsel.

You may hire your own lawyer at your own cost if you want a lawyer other than Class Counsel to represent you in this lawsuit.

Class Counsel

23. How will Class Counsel be paid?

Class Counsel will ask the Court for attorneys' fees of one-third of the Settlement Fund, plus reimbursement of costs and Service Awards for the Class Representatives of \$2,500 each. If awarded by the Court, these requested amounts will be paid from the Settlement Fund. The Court may award less than these amounts.

Final Approval Hearing

24. When is the Final Approval Hearing?

When: December 1, 2026, at 10:00 a.m. ET

Where: Richard B. Russell Federal Building, 2211 United States Courthouse, 75 Ted Turner Dr, SW, Atlanta, GA 30303

The date and time of the hearing may change without further notice. You should check www.WellstarDataPrivacySettlement.com to confirm the date and time of the hearing. The Court may decide to hold the hearing by video or telephone.

At the Final Approval Hearing, the Court will decide whether to approve the Settlement, Class Counsel's attorneys' fees and costs, Service Awards, and any objections.

Cash payments will be provided only if the Court approves the Settlement.

25. Do I have to attend the Final Approval Hearing?

No. Class Counsel will answer any questions from the judge. You may attend the hearing at your own expense, but you do not have to attend. If you file an objection, you do not have to attend the hearing to speak about it. If your objection is filed by the deadline, the Court will consider it.

26. May I speak at the Final Approval Hearing?

You or your lawyer may ask to appear at the hearing if you file an objection, but it is not required. If you file an objection by the deadline, the Court may listen to your objection at the hearing.

Get More Information

27. How do I get more information?

Here are the ways to get more information.



Visit:

www.WellstarDataPrivacySettlement.com



Call:

1-877-417-7863



Scan:



Email:

info@WellstarDataPrivacySettlement.com



Write:

Wellstar Pixel Settlement
Settlement Administrator
PO Box 2197
Portland, OR 97208-2197

PLEASE DO NOT CALL THE COURT OR CLERK'S OFFICE ABOUT THIS NOTICE.