United States District Court Southern District of Florida

Kueppers et al. v. Zumba Fitness, LLC
Case No. 0:24-cv-61983-WPD

NOTICE OF CLASS-ACTION CERTIFICATION & PROPOSED CLASS-ACTION SETTLEMENT

A PROPOSED SETTLEMENT REACHED IN A CERTIFIED CLASS ACTION LAWSUIT AGAINST ZUMBA FITNESS, LLC 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 Zumba Fitness, LLC ("Zumba") in a certified class action lawsuit. In the lawsuit, the Plaintiffs (or Class Representatives) allege that Zumba violated a federal law called the Video Privacy Protection Act (18 U.S.C. § 2710, et seq.) by purportedly using third-party digital tracking technologies to knowingly transmit certain personally identifiable information ("PII") about its customers' purchases to Meta Platforms, Inc. ("Meta"), MNTN, Inc. ("MNTN"), and Pinterest, Inc. ("Pinterest"). Zumba denies that it did anything wrong, and the Court has not decided who is right.
- The Court has "certified" a Class and three Subclasses, meaning that the people who filed the lawsuit can represent everyone in a similar position. A copy of the Court's Order granting class certification, as well as additional information about this case, is available online at www.ZumbaVPPASettlement.com.
- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the risks and uncertainties of continued litigation. A copy of the proposed Settlement Agreement, as well as additional information about the proposed Settlement, is available online at www.ZumbaVPPASettlement.com.

- If you received notice of this lawsuit and Settlement by e-mail or postal mail, Zumba's records and certain third-party records indicate that you are a Class Member and are entitled to benefits under the Settlement.

- 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
DO NOTHING	If you are a Class Member, and do nothing, you will automatically receive a settlement payment if the Court grants final approval of the Settlement. You will remain in the Class, and won't be able to be part of any other lawsuit against Zumba about the issues that this Settlement covers.	**No Deadline**
OPT OUT OF THE CLASS	You can choose to opt out of the Class and not receive a settlement payment. This option allows you to sue Zumba, or be part of another lawsuit against Zumba, about the issues that this Settlement resolves. You can hire your own lawyer at your own expense.	**Monday, December 14, 2026**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Class, you may object to any part of the Settlement 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 will remain in the Class and automatically receive a payment if the Court grants Final Approval.	**Monday, December 14, 2026**

- 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.

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Basic Information

1. Why was this Notice issued?

The United States District Court for the Southern District of Florida authorized this Notice. You have a right to know about the Court's certification of the Class and Subclasses in this lawsuit, 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 proposed Settlement reached by the parties. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called Kueppers et al. v. Zumba Fitness, LLC, Case No. 0:24-cv-61983-WPD. It is pending in the United States District Court for the Southern District of Florida. The people who filed this lawsuit are called the "Plaintiffs" (or "Class Representatives") and the company they sued, Zumba Fitness, LLC, is called the "Defendant."

2. What is this lawsuit about?

This lawsuit alleges that Zumba purportedly used third-party digital tracking technologies, commonly called "tracking pixels," on its Zumba.com website in a way that violated a federal privacy law called the Video Privacy Protection Act (or VPPA). Zumba 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. The individuals suing 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 exclude themselves (or "opt out"). In this Settlement, the Class Representatives are Catherine Kueppers and Watanya Brown. Everyone included in this Action are the Class Members.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or the Defendant are right in the lawsuit. 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 attorneys (called Class Counsel) 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 natural persons in the United States who purchased the ZB1 OD Version from the Website, and whose first and last names appeared on "order confirmation pages" accessible at ZB1 OD Version Order URLs in the possession of one or more Third-Party Advertisers, between October 22, 2022, and October 22, 2024.**

There are 4,543 people in the Class.

The Court has defined the three Subclasses this way:

> **Meta Disclosure Subclass:** "All members of the Class whose first and last names appeared on "order confirmation pages" accessible at ZB1 OD Version Order URLs in the possession of Meta Platforms, Inc."
>
> **Pinterest Disclosure Subclass:** "All members of the Class whose first and last names appeared on "order confirmation pages" accessible at ZB1 OD Version Order URLs in the possession of Pinterest, Inc."
>
> **MNTN Disclosure Subclass:** "All members of the Class whose first and last names appeared on "order confirmation pages" accessible at ZB1 OD Version Order URLs in the possession of MNTN, Inc."

Each Class Member is part of at least one Subclass. Class members may be part of one, two, or all three Subclasses.

6. Are there exceptions to being included?

If you are a member of the Class, you will be included in the Settlement unless you timely exclude yourself from the Class (or "opt out") pursuant to the terms of the Settlement Agreement. See Question 14 below for information about how to exclude yourself (or "opt out") of the Class.

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@ZumbaVPPASettlement.com
- Call toll free, 24/7: (866) 382-0528
- By mail:

Zumba VPPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement and other documents and information about the lawsuit and the Settlement at www.ZumbaVPPASettlement.com.

The Settlement Benefits

7. What does the Settlement provide?

Zumba has agreed to establish a Settlement Fund of $2,700,000.00. The Court may approve certain deductions from the Settlement Fund, such as notice and administration costs and attorneys' fees and costs. The net remaining money, called the Net Settlement Fund, will be divided between Class Members based on the number of Subclasses each Class Member belongs to.

IF YOU ARE A CLASS MEMBER, YOU WILL AUTOMATICALLY RECEIVE A SETTLEMENT PAYMENT IF THE COURT GRANTS FINAL APPROVAL, UNLESS YOU OPT OUT

(*see* **Question 14**).

Here is how each Class Member's payment will be calculated. Membership in each Subclass creates a share of the Net Settlement Fund. Class Members who are members of one Subclass will have one share; Class Members who are members of two Subclasses will have two shares; and Class Members who are members of all three Subclasses will have three shares.

If none of the Class Members opt out, there will be a total of 7,302 shares to be paid out to 4,543 Class Members. The amount of each share will be at least **$229.33**, though the final amount may be slightly larger if Class Members opt out, if administration expenses are less than expected, or if the Court awards Class Counsel less than the amount they request for an attorneys' fee and expense award.

If you are a Class Member, the specific amount of your cash payment is provided to you in the e-mail notice and postcard notice you were sent. If you believe you are a Class Member and did not receive an e-mail notice or postcard notice concerning this Settlement, please contact the Settlement Administrator at the e-mail or postal address below to confirm that you are a Class Member and, if you are, the amount of the cash payment you will receive if the Settlement is granted final approval by the Court.

If the Court grants final approval of the Settlement, Class Members will automatically receive their Settlement payments by check, which will be sent to the same addresses to which postcard notices of this Settlement were sent to Class Members by postal mail. The addresses to which Class Members' checks will be sent are also identified in the notices of this Settlement that were sent to Class Members by e-mail.

Class Members may change the addresses to which their checks should be sent, and may alternatively elect to receive their payments electronically, using the web-based forms available at www.ZumbaVPPASettlement.com.

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

- Email: info@ZumbaVPPASettlement.com
- Call toll free, 24/7: (866) 382-0528
- By mail:

Zumba VPPA Settlement
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P.O. Box 25226
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8. What claims am I releasing if I stay in the Class?

If you stay in the Class, you won't be able to sue Zumba or be part of any other lawsuit against Zumba about the issues that this Settlement covers. The "Releases" section of the Settlement Agreement (Section VI) describes in further detail the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at www.ZumbaVPPASettlement.com.

How Will I Get My Settlement Payment

9. Do I need to submit a claim to receive a Settlement payment?

No, you do not need to submit a claim to receive a Settlement payment. If you are a Class Member, you will automatically receive a settlement payment if the Court grants Final Approval, unless you choose to opt out of the Settlement (see Question 14).

If the Court grants final approval of the Settlement, Class Members will automatically receive their Settlement payments by check, which will be sent to the same addresses to which postcard notices of this Settlement were sent to Class Members by postal mail. The addresses to which Class Members' checks will be sent are also identified in the notices of this Settlement that were sent to Class Members by e-mail. Class Members may change the addresses to which their checks should be sent, and may alternatively elect to receive their payments electronically, using the web-based forms available at www.ZumbaVPPASettlement.com.

10. When will the Settlement payments be issued?

The Court will hold a final approval hearing on Thursday, January 21, 2027 at 1:00pm at Courtroom 205B at the U.S. Courthouse, 299 E. Broward Boulevard, Fort Lauderdale, Florida (see Question 17). 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 within 60 days of the Court granting final approval of the Settlement if no appeals are filed. If any appeals are filed and the Court's approval of the Settlement is not disturbed by the result of the appeal, Settlement payments will be distributed within 60 days of the appellate decision becoming final.

The Lawyers Representing You

11. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Frank S. Hedin and Tyler K. Somes of Hedin LLP to represent you and other Class Members ("Class Counsel"). Class Counsel may be reached by e-mail at fhedin@hedinllp.com or tsomes@hedinllp.com, or by postal mail at Hedin LLP, 1395 Brickell Ave., Ste 610, Miami, FL 33131.

12. Should I get my own lawyer?

You do not have to pay any money to Class Counsel out of pocket. Class Counsel will be paid for their services from the Settlement Fund if the Settlement is approved. If you want your own lawyer, you may hire one at your expense.

13. How will Class Counsel be paid?

Class Counsel intend to request an award of attorneys' fees of one-third of the Settlement Fund ($900,000) and reimbursement of their out-of-pocket litigation costs (which total $97,350.81). Any amount awarded by the Court will be paid from the Settlement Fund.

Excluding Yourself from the Class

14. How do I exclude myself from (or "opt out of") the Class?

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

If you exclude yourself from the Class, you are telling the Court that you do not want to be part of the Settlement, and you will not be able to receive a cash payment from the Settlement.

The deadline to exclude yourself is **Monday, December 14, 2026.**

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

(1) the name of the lawsuit: Kueppers et al. v. Zumba Fitness, LLC, No. 0:24-cv-61983-WPD (S.D. Fla.);
(2) your full name, mailing address, and email address;
(3) personal signature; and
(4) a clear statement that you wish to be excluded from the Class.

You may only exclude yourself—not any other person. For more information about how to exclude yourself from the Class, see Section VII of the Settlement Agreement, which is available on the Settlement Website.

You must mail your Request for Exclusion via first class U.S. Postal Mail to the Settlement Administrator at:

Zumba VPPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

To be valid, your Request for Exclusion must be postmarked by no later than **Monday, December 14, 2026.**

Objecting to the Settlement

15. How do I tell the Court that I do not like any aspect of the Settlement?

If you are a Class Member and do not like part or all of the Settlement (including Class Counsel's requested Attorneys' Fee and Expense Award), you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve any aspect of the Settlement. The Court will consider your views. You cannot object if you have excluded yourself from the Settlement (see Question 14)

Any Class Member who wishes to object must do so in writing. Any objection must contain the following:

1. a statement that identifies your submission as an "Objection to Class Settlement in Kueppers et al. v. Zumba Fitness, LLC, No. 0:24-cv-61983-WPD (S.D. Fla.)";
2. the objector's full name, mailing address, and telephone number;
3. if the objector has hired his or her own lawyer in connection with the objection, the lawyer's full name, mailing address, and telephone number; and
4. the factual basis and legal grounds for the objection, including any documents or information sufficient to establish that the objector is a Class Member.

For an objection to be valid, it must meet these requirements and be either filed with the Court on the docket of the lawsuit by no later than **Monday, December 14, 2026**, or be mailed to the Settlement Administrator and the Clerk of the Court, at the addresses provided below, postmarked no later than **Monday, December 14, 2026**.

Clerk of the Court	Settlement Administrator
Clerk's Office U.S. Federal Building and Courthouse 299 East Broward Boulevard #108 Fort Lauderdale, FL 33301	Zumba VPPA Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799-9958

If an objector or his or her attorney chooses to appear at the Final Approval Hearing, then by no later than the Opt-Out and Objection Date, a notice of intention to appear, either in person or through an attorney, must be either filed with the Court on the docket of the lawsuit or mailed to the Settlement Administrator and the Clerk of the Court at the addresses provided above, and shall list the name, address, and telephone number of the person and/or any attorney who will appear.

16. 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 is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out, you cannot object to the Settlement because the Settlement no longer affects you.

The Court's Final Approval Hearing

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

The Court will hold a final approval hearing on **Thursday, January 21, 2027, at 1:00pm at Courtroom 205B at the U.S. Courthouse, 299 E. Broward Boulevard, Fort Lauderdale, Florida.**

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. The Court will also consider any objections to the Settlement. You may attend the final approval hearing, but you do not have to.

If you are a Class Member who objects to the Settlement, you or your lawyer may ask permission to speak at the hearing concerning your objection (***See* Question 15**).

The date and time or location of this hearing may change without further notice. Please check www.ZumbaVPPASettlement.com for any updates to the date and time or location of this hearing.

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

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

If you file an objection to the Settlement, you may but 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 or postmarked on time and complies with the requirements for filing objections (**See Question 15**).

If I Do Nothing

19. What happens if I do nothing at all?

If you are a Class Member, and you do nothing, you will automatically receive a settlement payment. You will also give up the right to sue Zumba for the claims referenced in Question 8 and described more fully in the "Releases" section of the Settlement Agreement, which is available on the Settlement Website.

Getting More Information

20. 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.ZumbaVPPASettlement.com.

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

- Email: info@ZumbaVPPASettlement.com
- Call toll free, 24/7: (866) 382-0528
- By mail:

Zumba VPPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You may also write to or e-mail Class Counsel at the addresses provided in Question 11 above.

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, U.S. Federal Building and Courthouse, 299 East Broward Boulevard #108, Fort Lauderdale, FL 33301.

PLEASE DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT, EXCEPT IF YOU ARE SUBMITTING AN OBJECTION TO THE SETTLEMENT