

NOTICE OF CLASS ACTION
SETTLEMENT

You may be entitled to submit a claim for monetary compensation under a proposed class action settlement.

www.GHPPixelSettlement.com

In re Group Health Plan Litigation
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

FIRST-CLASS MAIL
U.S. POSTAGE PAID
CITY, STATE ZIP
PERMIT NO. XXXX



Postal Service: Please do not mark barcode

Class Member ID: «Claimant ID»
«FirstName» «LastName»
«Address1» «Address2»
«City», «StateCd» «Zip»

WHO IS A CLASS MEMBER?

In the lawsuit *In re Group Health Plan Litigation*, No. **23-cv-00267-JWB-DJF**, you are a Settlement Class Member if you logged into healthpartners.com and virtuwel.com, between January 1, 2018 and November 10, 2023 (the “Settlement Class”). You are receiving this Notice because you have been identified as a Settlement Class member according to Defendant’s records.

In the lawsuit, Plaintiffs allege that Defendant Group Health, Inc., d/b/a HealthPartners (“HealthPartners”) used certain Internet tracking technology supplied by a third party, including a piece of code known as a “pixel” (referred to herein as “Tracking Tools”), on its websites, that allegedly may have caused certain personal or health-related information to have been disclosed to a vendor or third party. HealthPartners denies any wrongdoing and all the claims asserted against it, and the Court has not ruled that HealthPartners did anything wrong.

WHAT ARE THE SETTLEMENT BENEFITS AND TERMS?

Settlement Class Members who submit a valid Claim Form may receive a pro rata cash payment from the Net Settlement Fund. The Net Settlement Fund is what remains of the \$6,000,000 Settlement Fund following the payment of the Notice and Settlement Administration Costs, any Class Representative Service Awards (\$2,500 per Class Representative), and any Attorneys’ Fees and Expenses Award (up to one-third (i.e. \$2,000,000) of the Settlement Fund, plus up to \$50,000 in expenses). More information, including a copy of the Settlement Agreement, is available at www.GHPPixelSettlement.com.

WHAT ARE YOUR RIGHTS AND OPTIONS?

Submit a Claim Form. To qualify for a cash payment, you must timely mail a Claim Form that is attached to this Notice or complete and submit a Claim Form online at www.GHPPixelSettlement.com. Your Claim Form must be postmarked or submitted online no later than **April 7, 2025**.

Opt-Out. You may exclude yourself from the Settlement and retain your ability to sue Group Health by mailing a written Request for Exclusion to

the Settlement Administrator that is postmarked no later than **March 5, 2025**. If you do not exclude yourself, you will be bound by the Settlement and give up your right to sue regarding the Released Claims.

Object. If you do not exclude yourself, you have the right to object to the Settlement. Written objections must be filed with the Court no later than **March 5, 2025**, and provide the reasons for the objection.

Do Nothing. If you do nothing, you will not receive a Settlement payment and will lose the right to sue regarding the Released Claims. You will be bound by the Court’s decision because this is a conditionally certified class action.

Attend the Final Approval Hearing. The Court will hold a **Final Approval Hearing at 2:00 p.m. on June 26, 2025**, in the U.S. District Courthouse at 316 N. Robert Street, St. Paul, Minnesota 55101, to determine if the Settlement is fair, reasonable, and adequate. You may appear at the Final Approval Hearing, but you do not have to.

Who are the attorneys for the Plaintiffs and the proposed Settlement Class? The Court appointed Bryan L. Bleichner, Christopher P. Renz and Gary M. Klinger as Class Counsel to represent the Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have any obligation to pay attorneys’ fees or expenses? No. Any Attorneys’ Fees and Expenses will be paid exclusively from the Settlement Fund as approved by the Court. The motion for Attorneys’ Fees and Expenses will be posted on the Settlement Website after it is filed with the Court.

What is the amount of the Class Representative Service Awards? The named Plaintiffs, also called the Class Representatives, will seek Service Awards in the amount of \$2,500 each for their efforts in this case.

Who is the Judge overseeing this Settlement? Jerry W. Blackwell, United States District Judge, District of Minnesota.

Where can I learn more about the case, the Settlement, and my options? www.GHPPixelSettlement.com.

Apply
Postage
HERE

In re Group Health Plan Litigation
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164



Class Member ID: <<claimant ID>>

CLAIM FORM

Claims for a cash payment must be postmarked no later than April 7, 2025. You may also submit a Claim Form online at: www.GHPPixelSettlement.com no later than April 7, 2025.

NAME: _____

ADDRESS: _____

Cash Payment: Would you like to receive a cash payment under the Settlement? (circle one) Yes No

If you are a Settlement Class Member, you may receive a cash payment from the Net Settlement Fund, after all claims are received.

Select from one of the following payment options:

*PayPal _____ *Venmo _____ *Zelle _____ *Virtual Prepaid Card _____ (requires an email address) Check _____

*Please provide your email address or phone number associated with your PayPal, Venmo, or Zelle account, or email address for the Virtual Prepaid Card:

By signing my name below, I confirm that I would like to receive a cash payment under the Settlement.

(Signature)