

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**DECLARATION OF BRYN BRIDLEY
ON CLASS NOTICE AND
SETTLEMENT ADMINISTRATION**

I, BRYN BRIDLEY, declare as follows:

1. I am the Vice President of Business Development at Atticus Administration, LLC (“Atticus”), a firm providing class action and claims administration services. I have extensive experience with class action notice and settlement administration. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement in this matter.

2. Atticus is the Court-approved Settlement Administrator for the above-captioned action and is responsible for the carrying out the Notice Program and other terms of the Settlement Agreement in accordance with the Court’s *Order for Preliminarily Approval of Class Action Settlement* (“Preliminary Approval Order”) dated November 5, 2024.

3. I submit this declaration to provide a summary of the settlement administration activities completed to date with respect to this action, including: (i) CAFA Notice, (ii) dissemination of the *Notice of Class Action Settlement* (“Class Notice”), (iii) Settlement Website and toll-free information line, (iii) exclusion requests and objections received, and (iv) Claim Form summary.

I. CAFA NOTICE

4. On September 6, 2024, Atticus sent notice of the proposed settlement to the U.S. Attorney General, and the Attorneys General of 54 U.S. states and territories in compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715. CAFA Notices were sent by U.S. Priority Mail or email, according to the Attorney General preferences. Each CAFA packet was comprised of a cover letter from Atticus and the relevant case documents, including inter alia, the

Class Action Complaints filed, proposed Class Notice and Claim Form, proposed Motion for Preliminary Approval, Settlement Agreement, and a table depicting the estimated number of Class Members residing in each state. A true and correct copy of CAFA cover letter is attached hereto as **Exhibit A**.

II. CLASS NOTICE DISSEMINATION

5. On December 2, 2024, Defense Counsel provided Atticus with two (2) data files that contained name, address, and email address for 978,305 individuals who were identified by Defendant as having logged into either healthpartners.com or virtuwel.com between January 1, 2018 and November 10, 2023 (the “Class Period”) (“Settlement Class Members,” “Settlement Class,” or the “Class List”).

6. In total, 971,282 Class Member records included email addresses, 7,012 included mailing addresses but not email addresses, and 11 contained neither an email address nor mailing address. Prior to disseminating Class Notice by mail, 7,023 of the final Class List of 971,305 was processed through the National Change of Address database maintained by the United States Postal Service (“USPS”). This process returns address updates for anyone who has filed change of address cards with the USPS anytime in the past four (4) years.

7. Direct Class Notice was sent to 971,282 Settlement Class Members by email (“Email Notice”) between January 2, 2025 and January 6, 2025. On January 6, 2025, Class Notice in the form of a four-panel postcard with a pre-addressed tear-off Claim Form (“Short Form Notice,” or “Postcard Notice”) was sent by U.S. First Class mail to 7,012 Settlement Class Members for whom email addresses were not received. Both notices explained who was included in the Settlement, the terms of the Settlement, the benefits available, the options available to Settlement Class Members and the deadlines to act on those options, the terms of the Settlement, and where more information could be found online. The Postcard Notice included a pre-addressed perforated tear-off Claim Form that could be completed and returned by mail and the email notice included a direct link to the Settlement Website where additional information was available and

Claim Forms could be completed and submitted online. True and correct copies of the emailed notice and mailed Postcard Notice are attached hereto as **Exhibit B**.

8. Of the 971,282 Class Notices sent by email, 84,608 “bounced” and could not be delivered to the intended Class Members. Postcard Notices were sent by U.S. First Class to this group of Class Members on February 4, 2025. In sum, 886,674 Email Notices or 91.29% of the emails were successfully dispersed.

9. Of the 91,620 total Postcard Notices mailed (7,012 to Class Members without email addresses and 84,608 Class Members with undeliverable Email Notices) 1,401 were returned as undeliverable. One (1) of the returned Postcard Notices included forwarding information and was promptly remailed. 1,386 of the undeliverable records were sent to a professional service for address tracing where new addresses were received for 526 records and were not received for 860 records. Postcard Notices were promptly remailed to the 526 addresses received from trace, 107 of which were returned to Atticus a second time. Fourteen (14) undeliverable records received after the April 7, 2025 Claim Deadline were not traced. In total, 90,639 Postcard Notices or 98.93% of the notices sent by mail were successfully dispersed.

10. During the Notice Period and prior to the Claim Deadline, Atticus received a number of inquiries from individuals who were not included on the Class List but believed that they fit the definition of the Settlement Class. Atticus forwarded the information obtained from these inquiries to Defense Counsel and sent Class Notice to the individuals when eligibility was received. Atticus received 128 eligibility inquiries, 68 of which were ultimately added to the Settlement Class per Defense Counsel’s direction.

III. SETTLEMENT WEBSITE AND TOLL-FREE INFORMATION LINE

11. Atticus purchased the URL and established the content located at www.GHPPixelsettlement.com for this action. The URL address was printed in the Postcard Notice and included in the body the Email Notice as a direct clickable link. The Settlement Website was published on December 20, 2024 to coincide with Class Notice dissemination and has been accessible since activation.

12. The Settlement Website includes access to the complete “Long Form Notice,” Claim Form, Preliminary Approval Order, and Settlement Agreement, answers to frequently asked questions, important Settlement dates and deadlines, and Atticus’s contact information. The Settlement Website also included a secure online Claim Form submission option that was accessible to Settlement Class Members through the April 7, 2025 Claim Deadline. True and correct copies of the Long Form Notice and Claim Form that are available for download from the Settlement Website are attached hereto as **Exhibit C**.

13. A total of 67,394 Claim Forms were filed via the Settlement Website. The website has had 152,161 visits to date and will remain accessible until the Settlement concludes.

14. Atticus secured the toll-free telephone number 1-888-833-7170 as the settlement information line for this matter. The telephone number was activated at the time notices were disseminated and has remained fully operational since activation. Live customer service representatives answer inbound during normal business hours. Settlement Class Members who call the toll-free line after hours or in any situation where a customer service representative is not available are given the opportunity to leave a voicemail message and receive a callback.

IV. EXCLUSION REQUESTS AND OBJECTIONS

15. Settlement Class Members who wished to exclude themselves from the Settlement had until March 5, 2025 to submit a written exclusion request that complied with the requirements included in the Long Form Notice and on the Settlement Website. Atticus received 67 exclusion requests.

16. Settlement Class Members who wished to ask the Court to deny approval of the proposed Settlement also had until March 5, 2025 to file a written objection in compliance with the requirements detailed in the Long Form Notice and on the Settlement Website. Atticus did not receive any objections.

V. CLAIM FORMS

17. Settlement Class Members had until April 7, 2025 to file valid and timely Claim Forms to be eligible to receive a pro rata Cash Payment from the Net Settlement Fund. Settlement

Class Members were able to complete and submit an online claim through the Settlement Website, download and print a paper copy of the Claim Form from the website to complete and return, or complete and mail the Claim Form postcard included in the Postcard Notice.

18. Atticus received 78,326 Claim Forms – 67,394 filed online and 10,852 by mail, 75 by email, and five (5) by fax. Of the claims received, 74,473 are considered valid and 3,943 invalid. The 3,853 invalid claims include 3,363 duplicate submissions, 18 claims from individuals who are not members of the Settlement Class, and 472 invalid claims for failure to respond to the corrective requests, additional forms sent in response to corrective requests and untimely claims. Included in the valid claims submitted to Atticus was a claim by Ms. Jennifer Stewart submitted on March 6, 2025, the same individual who Atticus subsequently learned filed an objection with the Court at ECF Doc. 147.

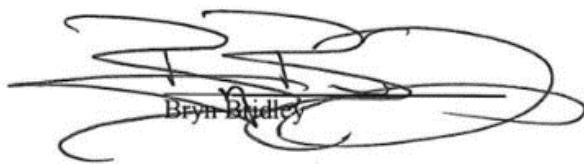
19. Five hundred fifty (550) Settlement Class Members submitted incomplete Claim Forms and were sent a *Notice of Deficient Claim Form / Opportunity to Correct* letter (“Cure Letter”) informing them on the form deficiency(s) and the date by which they had to respond to correct the deficiency(s). The Cure Letter provides the Settlement Class Member with an explanation of the item(s) that are incomplete on their submission and the deadline by which they must respond to correct their form and be eligible for benefits. A true and correct copy of the Cure Letter template, depicting all potential corrective needs is attached hereto as **Exhibit D**.

20. Ultimately, 8% of the Settlement Class filed claims and 74,473 of the Claim Forms received are valid for Cash Payments from the Net Settlement Fund.

21. The fee for Atticus’ administration services in this matter is \$312,627.00.

22. Throughout the settlement administration process, Atticus has been compliant with its *Data Security Information & Privacy Policy*, which was attached as Exhibit C to the Declaration of Chris Longley on Behalf of Atticus Administration, LLC filed in the above-captioned matter at ECF Dkt. 141.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and executed on this 27th day of May 2025 in Saint Paul, Minnesota.



Bryn Bradley

EXHIBIT A



1295 Northland Drive
STE 160
St. Paul MN 55120

1-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

September 6, 2024

VIA U.S. PRIORITY MAIL

AG Name
Attorney General of State
Address 1
Address 2
City State Zip

Re: **Class Action Fairness Act Notice**
In Re: Group Health Plan Litigation
Case No. 23-cv-00267-JWB-DJF
United States District Court
District of Minnesota

Dear Sir or Madam,

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in a putative class action lawsuit in the above-referenced class action (the “Action”) pending in United States District Court, District of Minnesota. The parties have proposed to settle the claims asserted in the Action with the terms of a Settlement Agreement which was filed with the Court on August 30, 2024.

This notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. The enclosed CD-ROM, the contents of which are identified below, includes all of the materials requested under the statute.

Contents of the Enclosed CD-ROM

1. Class Action Complaints filed with the Court on February 2, 2023 by Plaintiff Kelly Vriezen, on February 24, 2023 by Plaintiff Kaye Lockrem, and on February 28, 2023 by Plaintiff Sandra Tapp before the matters were consolidated, and the operative Consolidated Class Action Complaint filed with the Court on July 14, 2023 (Attachments 1-4)
2. Declaration of Christopher P. Renz in Support of Plaintiffs’ Unopposed Amended Motion for Preliminary Approval of Class Action Settlement (Attachment 5)
3. Declaration of Chris Longley on behalf of Atticus Administration, LLC (Attachment 6)
4. Plaintiffs’ Unopposed Amended Motion for Preliminary Approval of Class Action Settlement and Memorandum in Support (“Motion for Settlement Approval”) (Attachment 7)



ATTICUS

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STE 160
St. Paul MN 55120

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www.atticusadmin.com

5. Notice of Hearing on Plaintiffs' Unopposed Amended Motion for Preliminary Approval of Class Action Settlement (Attachment 8)
6. Proposed Order for Preliminary Approval of Class Action Settlement ("Preliminary Approval Order") (Attachment 9)
7. Notice Program ("Proposed Notice") (Attachment 10)
 - a. Long Form Notice
 - b. Short Form Notice
 - c. Claim Form
8. Settlement Agreement and Release ("Settlement Agreement") (Attachment 11)
9. An approximate percentage breakdown of Class Members by State and Territories (using last known address of residence) (Attachment 12). The Settlement Class contains approximately 978,305 individuals located throughout the United States and its territories. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the Class Members' submission of a claim form.

A final judgment has not been entered in this action, and no notice of dismissal has been filed at this time. The Court has not yet scheduled a Fairness Hearing.

At this time, no written judicial opinions have been issued in this Action relating to the materials described in 28 U.S.C. § 1715(b) (3)-(6) regarding any proposed or final notification to the class members, any proposed or final class action settlement, any settlement or other contemporaneous agreement, or final judgment or notice of dismissal.

If you are unable to access any of the information included on the enclosed CD or if you have any questions regarding the proposed settlement, kindly contact counsel for the Defendant, Elizabeth A. Scully, with BakerHostetler at escully@bakerlaw.com or 202-861-1698, at your earliest convenience.

With kind regards,

Office of the Settlement Administrator

Enclosure – CD-ROM

EXHIBIT B

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT***In re Group Health Plan, Inc., No. 23-cv-00267-JWB-DJF (D. Minn.)****A United States District Court authorized this Notice. This is not a solicitation from a lawyer.***THIS IS A NOTICE OF A PROPOSED SETTLEMENT OF A CLASS ACTION LAWSUIT.****THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.****YOUR LEGAL RIGHTS ARE AFFECTED EVEN IF YOU DO NOTHING.****PLEASE READ THIS NOTICE CAREFULLY.**

YOU MAY BE ENTITLED TO PARTICIPATE IN A CLASS ACTION SETTLEMENT BECAUSE YOUR PERSONAL INFORMATION MAY HAVE BEEN SHARED WITH THIRD PARTIES IF YOU VISITED HEALTHPARTNERS AND VIRTUWELL WEBSITES BETWEEN JANUARY 1, 2018 AND NOVEMBER 10, 2023. DEFENDANT GROUP HEALTH PLAN, INC., D/B/A HEALTHPARTNERS (“HEALTHPARTNERS”) DENIES THESE ALLEGATIONS.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM BY APRIL 7, 2025	<p>If you submit a Claim Form by April 7, 2025, you may receive a pro rata share of the Net Settlement Fund as compensation. You must timely submit a Claim Form either via U.S. mail or online to receive monetary compensation under this Settlement.</p> <p>IF YOU DO NOTHING, you will not receive Settlement benefits, but you will still be bound by the Settlement.</p>
EXCLUDE YOURSELF FROM THE SETTLEMENT BY MARCH 5, 2025	You will receive no benefits, but you will retain any legal claims you may have against HealthPartners.
OBJECT BY MARCH 5, 2025	File with the Court a written objection to the Settlement, at the address below, about why you do not like the Settlement. You must remain in the Settlement Class to object to the Settlement.
GO TO THE FINAL APPROVAL HEARING ON JUNE 26, 2025 AT 2:00 P.M.	Ask to speak in Court about the fairness of the Settlement. You do not need to attend the hearing to object to the Settlement, or to receive monetary compensation under the Settlement.

1. What is this Notice?

This is a court-authorized Long-Form Notice of a proposed Settlement (the “Settlement”) of a class action lawsuit (the “Litigation”), *In re Group Health Plan Litigation.*, Case No. **23-cv-00267-JWB-DJF**, pending in the United States District for the District of Minnesota (the “Court”). The Settlement would resolve the Litigation that arose on February 2, 2023, after a Class Action Complaint was filed alleging that because Group Health Plan, Inc., d/b/a HealthPartners (“HealthPartners” or “Defendant”) had 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, certain personal or health-related information may have been disclosed to a vendor or third party. Defendant denies all claims asserted against it in the Litigation, denies all allegations of wrongdoing and liability, and denies all material allegations of the Class Action Complaint.

The Court has granted Preliminary Approval of the Settlement Agreement and has conditionally certified the Settlement Class for purposes of Settlement only. This Long-Form Notice explains the nature of the Litigation, the terms of the Settlement Agreement, and the legal rights and obligations of members of the Settlement Class. Please read the instructions and explanations below carefully so that you can better understand your legal rights. The Settlement Administrator in this case is Atticus Administration.

This Notice summarizes the proposed settlement. For the precise terms of the settlement, please see the Settlement Agreement available at www.GHPPixelSettlement.com, by contacting Class Counsel at the information set forth in Paragraph 13, by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (“PACER”) system at <https://ecf.mnd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Minnesota between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

2. Why did I get this Notice?

The Court authorized this Notice because as an identified potential Class Member you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to receive those benefits.

3. What is this lawsuit about?

The Litigation arises out of HealthPartners’ implementation and use of Tracking Tools on its websites, which Plaintiffs allege caused their web usage data—containing personal and health-related information—to be shared with a third party, allegedly resulting in the invasion of Plaintiffs’ and

Settlement Class Members' privacy (referred to herein as the "Pixel Disclosure"). Plaintiffs allege that the "Pixel Disclosure" occurred between January 1, 2018 and November 10, 2023.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a "Class Representative" brings a single lawsuit on behalf of other people who have similar claims. In a class action settlement, all of these people together are a "Settlement Class" or "Settlement Class Members." When a class action is settled, the Settlement, which must be approved by the Court, resolves the claims for all Settlement Class Members, except for those who exclude themselves from the Settlement.

5. Why is there a settlement?

To resolve this matter without the expense, delay, and uncertainties of protracted litigation, the Parties reached a Settlement that, if approved by the Court, would resolve all claims brought on behalf of the Settlement Class related to the alleged Pixel Disclosure. If approved by the Court, the Settlement Agreement requires HealthPartners to provide cash compensation to Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by HealthPartners and does not imply that there has been, or would be, any finding that HealthPartners violated the law. The Court overseeing the Litigation has not determined that HealthPartners did anything wrong.

The Court already has preliminarily approved the Settlement Agreement. Nevertheless, because the settlement of a class action determines the rights of all members of the Settlement Class, the Court overseeing this Litigation must give final approval to the Settlement Agreement before it can be effective. The Court has conditionally certified the Settlement Class for settlement purposes only, so that members of the Settlement Class may be given notice and the opportunity to exclude themselves from the Settlement Class or to voice their support or opposition to final approval of the Settlement Agreement. If the Court does not grant final approval to the Settlement Agreement, or if it is terminated by the Parties, then the Settlement Agreement will be void, and the Litigation will proceed as if there had been no settlement and no certification of the Settlement Class.

6. How do I know if I am a part of the Settlement?

The Settlement Class includes: all individuals who logged into healthpartners.com and virtuwel.com, between January 1, 2018 and November 10, 2023 ("Settlement Class").

Excluded from the Class are: (i) the officers and directors of Defendant and its affiliates, parents, and subsidiaries; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and judicial staff; (iii) any individual who timely and validly excludes themselves from the Settlement, and (iv) the successors or assigns of any such excluded persons. This

exclusion does not apply, and should not be read to apply, to those employees of Defendant who receive notification from the Settlement Administrator regarding this Settlement Agreement.

If you received a Notice of this Settlement via mail or email, then you have been identified as a Settlement Class Member based on Defendant's records.

YOUR BENEFITS UNDER THE SETTLEMENT

7. What can I get from the Settlement?

Settlement Class Members who file a valid and timely 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 Notice and Settlement Administration Costs, Class Representative Service Awards (\$2,500 per Class Representative), and Attorneys' Fees and Expenses Award (fees up to one third of the Settlement Fund or \$2,000,000, plus expenses up to \$50,000.00), subject to the Court's approval.

*****To receive Settlement benefits, you must submit a Claim Form by April 7, 2025*****

8. When will I receive the benefits?

If you timely submit a valid Claim Form for a cash payment, you will receive payment in the amount approved by the Settlement Administrator once the Settlement is Final and has become effective.

9. I want to be a part of the Settlement. What do I do?

All Settlement Class Members are part of the Settlement unless they request to be excluded from it. To submit a claim for cash compensation, you must timely submit the Claim Form on the Settlement Website at www.GHPPixelSettlement.com, or by mail to In re Group Health Plan Litigation c/o Atticus Administration PO Box 64053 St. Paul, MN 55164.

You must submit any claims by **April 7, 2025**. There can be only one (1) valid and timely Claim per Settlement Class Member.

10. What am I giving up if I remain in the Settlement?

By staying in the Settlement Class, you will give HealthPartners a "release," and all the Court's orders will apply to you and bind you. A release means you cannot sue or be part of any other lawsuit or other legal action against HealthPartners about or arising from the claims or issues in this Litigation, HealthPartners' use of Tracking Tools, or the alleged Pixel Disclosure.

The precise terms of the release are in the Settlement Agreement, which is available on the Settlement Website. Unless you formally exclude yourself from this Settlement, you will release your claims. If you have any questions, you can talk for free to Class Counsel identified below who have been

appointed by the Court to represent the Settlement Class, or you are welcome to talk to any other lawyer of your choosing at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the Settlement, and instead want to keep any legal claims you may have against HealthPartners, then you must take steps to exclude yourself from this Settlement.

11. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail stating that you want to be excluded from *In re Group Health Plan Litigation*, Case No. 23-cv-00267-JWB-DJF to the Settlement Administrator. Such notice must include: (1) the case name and number of the Litigation (*In re Group Health Plan Litigation*, Case No. 23-cv-00267-JWB-DJF); (2) your full name, address, and telephone number; (3) your personal and original signature; and (4) a written statement that you wish to be excluded from the Settlement. You may only request exclusion for yourself, and no one else can request exclusion for you. You must mail your exclusion request so that it is postmarked **no later than March 5, 2025**, to:

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

12. If I exclude myself, do I still receive benefits from this Settlement?

No, if you submit an exclusion request, you will not receive anything from the Settlement, but you may sue HealthPartners over the claims raised in the Litigation.

THE LAWYERS REPRESENTING THE SETTLEMENT CLASS

13. Do I have a lawyer in this case?

The Court has appointed the following attorneys to represent the Settlement Class as Class Counsel:

Class Counsel
Milberg Coleman Bryson Phillips Grossman, PLLC
c/o Gary M. Klinger
227 W. Monroe Street, Suite 2100
Chicago, IL 60606

Chestnut Cambronne PA
c/o Bryan L. Bleichner and Christopher P. Renz
100 Washington Ave., Ste. 1700
Minneapolis, MN 55401-2138

If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers for the Settlement Class be paid?

Class Counsel will be paid from the Settlement Fund. Class Counsel will seek Court approval to be paid reasonable attorneys' fees up to one-third of the Settlement Fund (up to \$2,000,000), plus their expenses incurred in the Litigation up to \$50,000. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed.

OBJECTING TO THE SETTLEMENT**15. How do I tell the Court that I do not like the Settlement?**

If you are a Settlement Class Member, you can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different 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 should object.

Any objection to the proposed settlement must be in writing. If you file a timely objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your attorney. If you appear through your attorney, you are responsible for hiring and paying that attorney. In order to object to the Settlement, you must submit a written objection (such as a letter or legal brief) stating that you object and the reasons why you think the Court should not approve some or all of the Settlement. Your objection must include: (i) the case name and number of the Litigation (*In Re: Group Health Plan Litigation*, Case No. 23-cv-00267 (JWB/DJF) (D. Minn.)); (ii) your full name, current address, telephone number, and email address; (iii) your personal and original signature; (iv) if you are represented by an attorney, or received assistance from an attorney in drafting your objection, the name, address, telephone number, and email address of the attorney; (v) a statement indicating the basis for your belief that you are a member of the Settlement Class; (vi) a statement as to whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (vii) a statement of the legal and/or factual basis for the Objection; and (viii) a statement of whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through counsel.

If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your attorney. If you are objecting and represented by counsel, and such counsel intends to speak at the Final Approval Hearing, your written objection must also include (1) the identity of witnesses whom you intend to call to testify at the Final Approval Hearing; and (2) a description of any documents or evidence that you intend to offer at the Final Approval Hearing.

If you file an objection, you may still receive benefits under the Settlement so long as you timely file a valid claim. To be timely, written notice of an objection in the appropriate form described above must be filed with the Court no later than the Objection Deadline, March 5, 2025, and submitted to

the Court either by filing them electronically or in person at any location of the United States District Court for the District of Minnesota or by mailing them to the Court Clerk, United States District Court for the District of Minnesota, 316 N. Robert Street, Suite 100, St. Paul, MN 55101, and serving a copy of the filed objection on Class Counsel and Defendant's counsel at the following addresses:

CLASS COUNSEL

Milberg Coleman Bryson Phillips Grossman, PLLC
c/o Gary M. Klinger
227 W. Monroe Street, Suite 2100
Chicago, IL 60606

Chestnut Cambronne PA
c/o Bryan L. Bleichner and Christopher P. Renz
100 Washington Ave., Ste. 1700
Minneapolis, MN 55401-2138

DEFENDANT'S COUNSEL

Baker & Hostetler LLP
c/o Elizabeth Scully
1050 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036

THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to grant final approval of the Settlement. You may attend if you wish, but you are not required to do so.

16. Where and when is the Final Approval Hearing?

The Court has already given Preliminary Approval to the Settlement Agreement. A final hearing on the Settlement, called a Final Approval Hearing, will be held to determine the fairness of the Settlement Agreement.

The Court will hold a hearing on **June 26, 2025, at 2:00 p.m. CT** in the courtroom of the United States District Judge Jerry W. Blackwell, Courtroom 3B, which is located at the United States Courthouse, 316 N. Robert Street, Suite 100, St. Paul, Minnesota 55101. The purpose of the hearing will be for the Court to determine whether the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Settlement Class and to determine the appropriate amount of compensation for Class Counsel and rule on the request for a Service Award for the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement. The Court will then decide whether to approve the Settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THE FINAL APPROVAL HEARING TO RECIEVE BENEFITS FROM THIS SETTLEMENT. Please be aware that the hearing may be postponed to a later date without notice.

GETTING MORE INFORMATION – CONTACT:

This Notice only provides a summary of the proposed Settlement. Complete details about the Settlement can be found in the Settlement Agreement available on the Settlement Website.

www.GHPPixelSettlement.com

If you have any questions, you can contact the Settlement Administrator or Class Counsel at the phone numbers listed above. In addition to the documents available on the Settlement Website, all pleadings and documents filed in this Litigation may be reviewed or copied at the Clerk of Court's office.

DO NOT CALL OR SEND ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, OR HEALTHPARTNERS OR ITS COUNSEL. ALL QUESTIONS ABOUT THE SETTLEMENT SHOULD BE REFERRED TO THE SETTLEMENT ADMINISTRATOR OR CLASS COUNSEL.

**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)

EXHIBIT C

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT***In re Group Health Plan, Inc., No. 23-cv-00267-JWB-DJF (D. Minn.)****A United States District Court authorized this Notice. This is not a solicitation from a lawyer.***THIS IS A NOTICE OF A PROPOSED SETTLEMENT OF A CLASS ACTION LAWSUIT.****THIS IS NOT A NOTICE OF A LAWSUIT AGAINST YOU.****YOUR LEGAL RIGHTS ARE AFFECTED EVEN IF YOU DO NOTHING.****PLEASE READ THIS NOTICE CAREFULLY.**

YOU MAY BE ENTITLED TO PARTICIPATE IN A CLASS ACTION SETTLEMENT BECAUSE YOUR PERSONAL INFORMATION MAY HAVE BEEN SHARED WITH THIRD PARTIES IF YOU VISITED HEALTHPARTNERS AND VIRTUWELL WEBSITES BETWEEN JANUARY 1, 2018 AND NOVEMBER 10, 2023. DEFENDANT GROUP HEALTH PLAN, INC., D/B/A HEALTHPARTNERS (“HEALTHPARTNERS”) DENIES THESE ALLEGATIONS.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM BY APRIL 7, 2025	<p>If you submit a Claim Form by April 7, 2025, you may receive a pro rata share of the Net Settlement Fund as compensation. You must timely submit a Claim Form either via U.S. mail or online to receive monetary compensation under this Settlement.</p> <p>IF YOU DO NOTHING, you will not receive Settlement benefits, but you will still be bound by the Settlement.</p>
EXCLUDE YOURSELF FROM THE SETTLEMENT BY MARCH 5, 2025	You will receive no benefits, but you will retain any legal claims you may have against HealthPartners.
OBJECT BY MARCH 5, 2025	File with the Court a written objection to the Settlement, at the address below, about why you do not like the Settlement. You must remain in the Settlement Class to object to the Settlement.
GO TO THE FINAL APPROVAL HEARING ON JUNE 26, 2025 AT 2:00 P.M.	Ask to speak in Court about the fairness of the Settlement. You do not need to attend the hearing to object to the Settlement, or to receive monetary compensation under the Settlement.

1. What is this Notice?

This is a court-authorized Long-Form Notice of a proposed Settlement (the “Settlement”) of a class action lawsuit (the “Litigation”), *In re Group Health Plan Litigation.*, Case No. **23-cv-00267-JWB-DJF**, pending in the United States District for the District of Minnesota (the “Court”). The Settlement would resolve the Litigation that arose on February 2, 2023, after a Class Action Complaint was filed alleging that because Group Health Plan, Inc., d/b/a HealthPartners (“HealthPartners” or “Defendant”) had 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, certain personal or health-related information may have been disclosed to a vendor or third party. Defendant denies all claims asserted against it in the Litigation, denies all allegations of wrongdoing and liability, and denies all material allegations of the Class Action Complaint.

The Court has granted Preliminary Approval of the Settlement Agreement and has conditionally certified the Settlement Class for purposes of Settlement only. This Long-Form Notice explains the nature of the Litigation, the terms of the Settlement Agreement, and the legal rights and obligations of members of the Settlement Class. Please read the instructions and explanations below carefully so that you can better understand your legal rights. The Settlement Administrator in this case is Atticus Administration.

This Notice summarizes the proposed settlement. For the precise terms of the settlement, please see the Settlement Agreement available at www.GHPPixelSettlement.com, by contacting Class Counsel at the information set forth in Paragraph 13, by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (“PACER”) system at <https://ecf.mnd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Minnesota between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

2. Why did I get this Notice?

The Court authorized this Notice because as an identified potential Class Member you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for the benefits, and how to receive those benefits.

3. What is this lawsuit about?

The Litigation arises out of HealthPartners’ implementation and use of Tracking Tools on its websites, which Plaintiffs allege caused their web usage data—containing personal and health-related information—to be shared with a third party, allegedly resulting in the invasion of Plaintiffs’ and

Settlement Class Members' privacy (referred to herein as the "Pixel Disclosure"). Plaintiffs allege that the "Pixel Disclosure" occurred between January 1, 2018 and November 10, 2023.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a "Class Representative" brings a single lawsuit on behalf of other people who have similar claims. In a class action settlement, all of these people together are a "Settlement Class" or "Settlement Class Members." When a class action is settled, the Settlement, which must be approved by the Court, resolves the claims for all Settlement Class Members, except for those who exclude themselves from the Settlement.

5. Why is there a settlement?

To resolve this matter without the expense, delay, and uncertainties of protracted litigation, the Parties reached a Settlement that, if approved by the Court, would resolve all claims brought on behalf of the Settlement Class related to the alleged Pixel Disclosure. If approved by the Court, the Settlement Agreement requires HealthPartners to provide cash compensation to Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by HealthPartners and does not imply that there has been, or would be, any finding that HealthPartners violated the law. The Court overseeing the Litigation has not determined that HealthPartners did anything wrong.

The Court already has preliminarily approved the Settlement Agreement. Nevertheless, because the settlement of a class action determines the rights of all members of the Settlement Class, the Court overseeing this Litigation must give final approval to the Settlement Agreement before it can be effective. The Court has conditionally certified the Settlement Class for settlement purposes only, so that members of the Settlement Class may be given notice and the opportunity to exclude themselves from the Settlement Class or to voice their support or opposition to final approval of the Settlement Agreement. If the Court does not grant final approval to the Settlement Agreement, or if it is terminated by the Parties, then the Settlement Agreement will be void, and the Litigation will proceed as if there had been no settlement and no certification of the Settlement Class.

6. How do I know if I am a part of the Settlement?

The Settlement Class includes: all individuals who logged into healthpartners.com and virtuwel.com, between January 1, 2018 and November 10, 2023 ("Settlement Class").

Excluded from the Class are: (i) the officers and directors of Defendant and its affiliates, parents, and subsidiaries; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and judicial staff; (iii) any individual who timely and validly excludes themselves from the Settlement, and (iv) the successors or assigns of any such excluded persons. This

exclusion does not apply, and should not be read to apply, to those employees of Defendant who receive notification from the Settlement Administrator regarding this Settlement Agreement.

If you received a Notice of this Settlement via mail or email, then you have been identified as a Settlement Class Member based on Defendant's records.

YOUR BENEFITS UNDER THE SETTLEMENT

7. What can I get from the Settlement?

Settlement Class Members who file a valid and timely 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 Notice and Settlement Administration Costs, Class Representative Service Awards (\$2,500 per Class Representative), and Attorneys' Fees and Expenses Award (fees up to one third of the Settlement Fund or \$2,000,000, plus expenses up to \$50,000.00), subject to the Court's approval.

*****To receive Settlement benefits, you must submit a Claim Form by April 7, 2025*****

8. When will I receive the benefits?

If you timely submit a valid Claim Form for a cash payment, you will receive payment in the amount approved by the Settlement Administrator once the Settlement is Final and has become effective.

9. I want to be a part of the Settlement. What do I do?

All Settlement Class Members are part of the Settlement unless they request to be excluded from it. To submit a claim for cash compensation, you must timely submit the Claim Form on the Settlement Website at www.GHPPixelSettlement.com, or by mail to In re Group Health Plan Litigation c/o Atticus Administration PO Box 64053 St. Paul, MN 55164.

You must submit any claims by **April 7, 2025**. There can be only one (1) valid and timely Claim per Settlement Class Member.

10. What am I giving up if I remain in the Settlement?

By staying in the Settlement Class, you will give HealthPartners a "release," and all the Court's orders will apply to you and bind you. A release means you cannot sue or be part of any other lawsuit or other legal action against HealthPartners about or arising from the claims or issues in this Litigation, HealthPartners' use of Tracking Tools, or the alleged Pixel Disclosure.

The precise terms of the release are in the Settlement Agreement, which is available on the Settlement Website. Unless you formally exclude yourself from this Settlement, you will release your claims. If you have any questions, you can talk for free to Class Counsel identified below who have been

QUESTIONS? VISIT WWW.GHPPIXELSETTLEMENT.COM

appointed by the Court to represent the Settlement Class, or you are welcome to talk to any other lawyer of your choosing at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the Settlement, and instead want to keep any legal claims you may have against HealthPartners, then you must take steps to exclude yourself from this Settlement.

11. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail stating that you want to be excluded from *In re Group Health Plan Litigation*, Case No. **23-cv-00267-JWB-DJF** to the Settlement Administrator. Such notice must include: (1) the case name and number of the Litigation (*In re Group Health Plan Litigation*, Case No. **23-cv-00267-JWB-DJF**); (2) your full name, address, and telephone number; (3) your personal and original signature; and (4) a written statement that you wish to be excluded from the Settlement. You may only request exclusion for yourself, and no one else can request exclusion for you. You must mail your exclusion request so that it is postmarked **no later than March 5, 2025**, to:

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

12. If I exclude myself, do I still receive benefits from this Settlement?

No, if you submit an exclusion request, you will not receive anything from the Settlement, but you may sue HealthPartners over the claims raised in the Litigation.

THE LAWYERS REPRESENTING THE SETTLEMENT CLASS

13. Do I have a lawyer in this case?

The Court has appointed the following attorneys to represent the Settlement Class as Class Counsel:

Class Counsel
Milberg Coleman Bryson Phillips Grossman, PLLC
c/o Gary M. Klinger
227 W. Monroe Street, Suite 2100
Chicago, IL 60606

Chestnut Cambronne PA
c/o Bryan L. Bleichner and Christopher P. Renz
100 Washington Ave., Ste. 1700
Minneapolis, MN 55401-2138

If you want to be represented by your own lawyer, you may hire one at your own expense.

QUESTIONS? VISIT WWW.GHPPIXELSETTLEMENT.COM

14. How will the lawyers for the Settlement Class be paid?

Class Counsel will be paid from the Settlement Fund. Class Counsel will seek Court approval to be paid reasonable attorneys' fees up to one-third of the Settlement Fund (up to \$2,000,000), plus their expenses incurred in the Litigation up to \$50,000. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed.

OBJECTING TO THE SETTLEMENT**15. How do I tell the Court that I do not like the Settlement?**

If you are a Settlement Class Member, you can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different 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 should object.

Any objection to the proposed settlement must be in writing. If you file a timely objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your attorney. If you appear through your attorney, you are responsible for hiring and paying that attorney. In order to object to the Settlement, you must submit a written objection (such as a letter or legal brief) stating that you object and the reasons why you think the Court should not approve some or all of the Settlement. Your objection must include: (i) the case name and number of the Litigation (*In Re: Group Health Plan Litigation*, Case No. 23-cv-00267 (JWB/DJF) (D. Minn.)); (ii) your full name, current address, telephone number, and email address; (iii) your personal and original signature; (iv) if you are represented by an attorney, or received assistance from an attorney in drafting your objection, the name, address, telephone number, and email address of the attorney; (v) a statement indicating the basis for your belief that you are a member of the Settlement Class; (vi) a statement as to whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (vii) a statement of the legal and/or factual basis for the Objection; and (viii) a statement of whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through counsel.

If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your attorney. If you are objecting and represented by counsel, and such counsel intends to speak at the Final Approval Hearing, your written objection must also include (1) the identity of witnesses whom you intend to call to testify at the Final Approval Hearing; and (2) a description of any documents or evidence that you intend to offer at the Final Approval Hearing.

If you file an objection, you may still receive benefits under the Settlement so long as you timely file a valid claim. To be timely, written notice of an objection in the appropriate form described above must be filed with the Court no later than the Objection Deadline, March 5, 2025, and submitted to

QUESTIONS? VISIT WWW.GHPPIXELSETTLEMENT.COM

the Court either by filing them electronically or in person at any location of the United States District Court for the District of Minnesota or by mailing them to the Court Clerk, United States District Court for the District of Minnesota, 316 N. Robert Street, Suite 100, St. Paul, MN 55101, and serving a copy of the filed objection on Class Counsel and Defendant's counsel at the following addresses:

CLASS COUNSEL

Milberg Coleman Bryson Phillips Grossman, PLLC
c/o Gary M. Klinger
227 W. Monroe Street, Suite 2100
Chicago, IL 60606

Chestnut Cambronne PA
c/o Bryan L. Bleichner and Christopher P. Renz
100 Washington Ave., Ste. 1700
Minneapolis, MN 55401-2138

DEFENDANT'S COUNSEL

Baker & Hostetler LLP
c/o Elizabeth Scully
1050 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036

THE FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to grant final approval of the Settlement. You may attend if you wish, but you are not required to do so.

16. Where and when is the Final Approval Hearing?

The Court has already given Preliminary Approval to the Settlement Agreement. A final hearing on the Settlement, called a Final Approval Hearing, will be held to determine the fairness of the Settlement Agreement.

The Court will hold a hearing on **June 26, 2025, at 2:00 p.m. CT** in the courtroom of the United States District Judge Jerry W. Blackwell, Courtroom 3B, which is located at the United States Courthouse, 316 N. Robert Street, Suite 100, St. Paul, Minnesota 55101. The purpose of the hearing will be for the Court to determine whether the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Settlement Class and to determine the appropriate amount of compensation for Class Counsel and rule on the request for a Service Award for the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement. The Court will then decide whether to approve the Settlement.

QUESTIONS? VISIT WWW.GHPPIXELSETTLEMENT.COM

YOU ARE **NOT** REQUIRED TO ATTEND THE FINAL APPROVAL HEARING TO RECIEVE BENEFITS FROM THIS SETTLEMENT. Please be aware that the hearing may be postponed to a later date without notice.

GETTING MORE INFORMATION – CONTACT:

This Notice only provides a summary of the proposed Settlement. Complete details about the Settlement can be found in the Settlement Agreement available on the Settlement Website.

www.GHPPixelSettlement.com

If you have any questions, you can contact the Settlement Administrator or Class Counsel at the phone numbers listed above. In addition to the documents available on the Settlement Website, all pleadings and documents filed in this Litigation may be reviewed or copied at the Clerk of Court's office.

DO NOT CALL OR SEND ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO THE CLERK OF THE COURT, THE JUDGE, OR HEALTHPARTNERS OR ITS COUNSEL. ALL QUESTIONS ABOUT THE SETTLEMENT SHOULD BE REFERRED TO THE SETTLEMENT ADMINISTRATOR OR CLASS COUNSEL.

QUESTIONS? VISIT WWW.GHPPIXELSETTLEMENT.COM

<p>YOUR CLAIM FORM MUST BE SUBMITTED ON OR BEFORE APRIL 7, 2025</p>	<p>In re Group Health Plan Litigation c/o Atticus Administration PO Box 64053 St. Paul, MN 55164</p>	<p>FOR OFFICE USE ONLY</p>
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In re Group Health Plan Litigation

United States District Court for the District of Minnesota (Case No. **23-cv-00267-JWB-DJF**)

CLAIM FORM

**SAVE TIME BY SUBMITTING YOUR CLAIM ONLINE AT
WWW.GHPPIXELSETTLEMENT.COM**

GENERAL CLAIM FORM INFORMATION

You may complete and submit this Claim Form online or by mail if you are a Settlement Class Member. The Settlement Class consists of all individuals who logged into healthpartners.com and virtuwell.com between January 1, 2018 and November 10, 2023 (the “Settlement Class”).

If you wish to submit a Claim for a settlement cash payment, please provide the information requested below. You must submit your Claim via the Settlement Website by the Claims Deadline of **April 7, 2025**, or complete and mail this Claim Form to the Settlement Administrator, postmarked by **April 7, 2025**.

Settlement Class Members who submit a timely and valid Claim Form will be eligible to receive a pro rata cash payment from the Net Settlement Fund. Each Settlement Class Member will receive, at most, one (1) payment.

The Notice includes only a summary of your legal rights and options. Please visit the official Settlement Website, www.GHPPixelSettlement.com, or call (888) 833-7170 for more information.

TO SUBMIT A CLAIM FOR PAYMENT BY MAIL:

1. Complete all sections of this Claim Form.
2. Sign the Claim Form.
3. Submit the completed Claim Form to the Settlement Administrator so that it is postmarked by **April 7, 2025**.

This Claim Form should only be used if a Claim is being mailed and is not being filed online. You may go to www.GHPPixelSettlement.com to submit your Claim online, or you may submit this Claim Form by mail to the address at the top of this form.

Payment will be mailed in the form of a check to the address you provide below. If you would like to receive a payment electronically (e.g., via Venmo, PayPal, or ACH), you must submit a Claim Form online at www.GHPPixelSettlement.com.

1. Settlement Class Member Information_____
*First Name_____
MI_____
*Last Name_____
*Mailing Address: Street Address/P.O. Box (include Apartment/Suite/Floor Number)_____
*City_____
*State_____
*Zip Code_____
Zip4 (Optional)_____
@_____
*Current Email Address(____)____-____
Current Phone Number (Optional)

*Settlement Claim ID: _____

*Settlement Claim ID: Your Settlement Claim ID can be found on the Postcard Notice you received informing you about this Settlement. If you need additional help locating this ID, please contact the Settlement Administrator at (888) 833-7170.

2. Certification

I declare under penalty of perjury under the laws of the United States and the state where this Claim Form is signed that the information I have supplied in this Claim Form is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that all information provided on this Claim Form is subject to verification and that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid.

Signature____/____/____
Date (mm/dd/yyyy)_____
Print Name

Please keep a copy of your completed Claim Form for your records.

Mail your completed Claim Form to the Settlement Administrator:

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

or submit your Claim online at
www.GHPPixelSettlement.com

It is your responsibility to notify the Settlement Administrator of any changes to your contact information after you submit your Claim. You can update your contact information on the Contact page at
www.GHPPixelSettlement.com.

EXHIBIT D



CLAIMANT ID: <<claimant_ID>>
<<first name>> <<last name>>
<<address1>> <<address2>>
<<city>> <<state>> <<zip>>

NOTICE OF DEFICIENT CLAIM FORM / OPPORTUNITY TO CORRECT

Dear <<first name>> <<last name>>:

Thank you for submitting your Claim Form in the *In re Group Health Plan Litigation*, No. 23-cv-00267-JWB-DJF class action settlement. You are receiving this letter because the Claim Form you submitted did not meet the requirements of a valid claim and the parties wish to provide you an opportunity to meet the requirements through a further submission. **You have until <<20 days from the date of this letter>> to respond with the information necessary to correct the deficiency(s) specified in the next section of this letter.** If you wish to submit corrective information either email it, mail it, or fax it to the recipient addresses identified at the bottom of this letter.

CLAIM FORM NOT SIGNED

<<The Claim Form you submitted was not signed. Please sign and return the enclosed Claim Form by the date indicated in this letter to validate your claim.>>

BENEFIT NOT SELECTED

<< The Claim Form you submitted is incomplete. To be eligible for potential benefits, you must submit a complete and valid Claim Form.>>

PAYMENT METHOD INCOMPLETE

<<The Claim Form submitted included either an incomplete payment method, or no payment method was chosen. Please complete, sign and return the enclosed Claim Form by the date indicated in this letter to validate your claim.>>

UNKNOWN SIGNOR

<<The Claim Form submitted was not signed by the Class Member. If the Class Member is deceased, please provide a copy of the Death Certificate and evidence of the signor's right to act on their behalf.>>

Again, failure to respond to this deficiency notice and provide the requested information by <<20 days from the date of this letter>> will result in the rejection of your claim to the extent identified as deficient by this letter and you will not be eligible to receive compensation or other benefits offered in the Claim Form.

Please send your fully completed and signed Claim Form to the Settlement Administrator's office:

BY EMAIL: GHPPixelSettlement@AtticusAdmin.com
BY FAX: 1-888-326-6411
BY MAIL: In re Group Health Plan Litigation
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

For more information, please call toll-free 1-888-833-7170 or visit the Settlement Website at www.GHPPixelSettlement.com.

Sincerely,
Office of the Settlement Administrator

<<Claimant_ID>> - <<seq_id>>

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YOUR CLAIM FORM MUST BE SUBMITTED ON OR BEFORE APRIL 7, 2025	In re Group Health Plan Litigation c/o Atticus Administration PO Box 64053 St. Paul, MN 55164	FOR OFFICE USE ONLY
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In re Group Health Plan Litigation

United States District Court for the District of Minnesota (Case No. **23-cv-00267-JWB-DJF**)

CLAIM FORM

**SAVE TIME BY SUBMITTING YOUR CLAIM ONLINE AT
WWW.GHPPixelSETTLEMENT.COM**

GENERAL CLAIM FORM INFORMATION

You may complete and submit this Claim Form online or by mail if you are a Settlement Class Member. The Settlement Class consists of all individuals who logged into healthpartners.com and virtuwel.com between January 1, 2018 and November 10, 2023 (the "Settlement Class").

If you wish to submit a Claim for a settlement cash payment, please provide the information requested below. You must submit your Claim via the Settlement Website by the Claims Deadline of **April 7, 2025**, or complete and mail this Claim Form to the Settlement Administrator, postmarked by **April 7, 2025**.

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The Notice includes only a summary of your legal rights and options. Please visit the official Settlement Website, www.GHPPixelSettlement.com, or call (888) 833-7170 for more information.

TO SUBMIT A CLAIM FOR PAYMENT BY MAIL:

1. Complete all sections of this Claim Form.
2. Sign the Claim Form.
3. Submit the completed Claim Form to the Settlement Administrator so that it is postmarked by **April 7, 2025**.

This Claim Form should only be used if a Claim is being mailed and is not being filed online. You may go to www.GHPPixelSettlement.com to submit your Claim online, or you may submit this Claim Form by mail to the address at the top of this form.

Payment will be mailed in the form of a check to the address you provide below. If you would like to receive a payment electronically (e.g., via Venmo, PayPal, or ACH), you must submit a Claim Form online at www.GHPPixelSettlement.com.

1. Settlement Class Member Information_____
*First Name_____
MI_____
*Last Name_____
*Mailing Address: Street Address/P.O. Box (include Apartment/Suite/Floor Number)_____
*City_____
*State_____
*Zip Code_____
Zip4 (Optional)_____
@_____
*Current Email Address(____) ____ - ____
Current Phone Number (Optional)

*Settlement Claim ID: _____

*Settlement Claim ID: Your Settlement Claim ID can be found on the Postcard Notice you received informing you about this Settlement. If you need additional help locating this ID, please contact the Settlement Administrator at (888) 833-7170.

2. Certification

I declare under penalty of perjury under the laws of the United States and the state where this Claim Form is signed that the information I have supplied in this Claim Form is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that all information provided on this Claim Form is subject to verification and that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid.

Signature____/____/____
Date (mm/dd/yyyy)_____
Print Name

Please keep a copy of your completed Claim Form for your records.

Mail your completed Claim Form to the Settlement Administrator:

In re Group Health Plan Litigation

c/o Atticus Administration

PO Box 64053

St. Paul, MN 55164

or submit your Claim online at

www.GHPPixelSettlement.com

It is your responsibility to notify the Settlement Administrator of any changes to your contact information after you submit your Claim. You can update your contact information on the Contact page at

www.GHPPixelSettlement.com

<<Claimant_ID>> - <<seq_id>>