

*Jane Doe I, et al. v. Family Planning Associates Medical Group, Inc.*, Case No. 23CV37304  
Superior Court of the State of California, County of Alameda

## NOTICE OF CLASS ACTION SETTLEMENT

*You are not being sued. This notice affects your rights. Please read it carefully.*

**ATTENTION:** If you are a citizen of California and you used the FPA Women's Health website at any time between June 29, 2019 and May 14, 2024, to make an appointment, you may be eligible for benefits from a class action settlement.

*Para una notificación en Español, visitar [www.FPAsettlement.com](http://www.FPAsettlement.com).*

**PLEASE READ THIS NOTICE CAREFULLY.** This Notice relates to the proposed Settlement. If you are a Class Member, it contains important information affecting your rights to participate in the Settlement as further described below. This Notice advises you of the terms of the Settlement and your rights and options under it.

A settlement has been reached in a class action lawsuit against **FAMILY PLANNING ASSOCIATES MEDICAL GROUP, INC. d/b/a FPA women's Health** ("FPA" or "Defendant") relating to the alleged disclosure of personal information of patients and customers to Facebook as a result of FPA's use of the Meta Pixel on its website ("Website Usage Disclosure"). The information shared with Facebook through the use of the Meta Pixel and Google through its tracking pixels may have contained personally identifiable information and/or protected health information of certain individuals. Plaintiffs claim that Defendant was responsible for the Website Usage Disclosure and assert a claim for violations of the following laws: California Business & Professions Code section 17200, et seq., Invasion of Privacy and Violation of California Constitution, Art. 1, § 1; Confidentiality of Medical Information Act (CMIA), California Civil Code § 56.101 and 56.10; Violation of California Invasion of Privacy Act (CIPA), Penal Code §§ 630, et seq.: Comprehensive Computer Data Access and Fraud Act ("CDAFA") California Penal Code § 502 et seq.; California Penal Code §§ 484 and 496; and Breach of Contract and Breach of Implied Contract. Defendant denies the claim and Plaintiffs' allegations in the Lawsuit.

**If you are a citizen of California who used FPA's website to book an appointment during the Class Period between June 29, 2019, and May 14, 2024, you are included in this Settlement as a "Settlement Class Member."**

**The Settlement provides for payments of *pro rata* shares of the Settlement Fund to Settlement Class Members who timely submit valid claims.**

**The Settlement also provides for \$100 in restitution in the form of a voucher provided to each Class Member who submits a claim to use in payment or part-payment for any future visit to FPA or any good or service provided by FPA within 2 years of the Effective Date, i.e. date when the settlement is final.**

Your legal rights are affected regardless of whether you do or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>SUBMIT A CLAIM FOR COMPENSATION BY MARCH 12, 2026</b>	This is the only way you can get a cash payment and/or other benefit.
<b>EXCLUDE YOURSELF BY MARCH 12, 2026</b>	Exclude yourself from the Settlement, get no payment, and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit.
<b>OBJECT TO THE SETTLEMENT BY MARCH 12, 2026</b>	Object by submitting a written statement with reasons why you do not agree with the Settlement.
<b>GO TO THE FINAL FAIRNESS HEARING ON APRIL 14, 2026</b>	You may ask the Court for permission for you and/or your attorney to speak about your objection at the Final Approval Hearing.
<b>Do Nothing</b>	You will not get any compensation from this Settlement and you will give up certain legal rights. Submitting a Claim Form is the only way to obtain payment and/or other benefit from this Settlement.

These rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Settlement Agreement, available at [www.FPASettlement.com](http://www.FPASettlement.com), or call 1-844-314-4124.

The Court in charge of this case still has to decide whether to grant final approval of the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals of the Court's order granting final approval are resolved.

## **1. Why is this Notice being provided?**

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what payments are available, who is eligible for them, and how to get them.

## **2. What is this lawsuit about?**

The Lawsuit alleges that Defendant shared or otherwise made accessible to third parties (including but not limited to Meta Platforms, Inc., Google, LLC, DoubleClick, and LinkedIn) certain of its users' personal and medical information, such as the type of appointment booked, without permission. FPA expressly denies any liability or wrongdoing.

The Court in charge of this case is the Superior Court for the State of California, County of Alameda ("Alameda Superior Court"). The case is captioned *Jane Doe I and Jane Doe II v. Family Planning Associates Medical Group, Inc.*, Case No. 23CV037304 (the "Lawsuit"). The people who filed the Lawsuit are called the Plaintiffs and the entity they sued, *Family Planning Associates Medical Group, Inc.*, is called the Defendant.

## **3. What is a class action?**

In a class action, one or more people called Plaintiffs and Class Representatives sue on behalf of people who have similar claims. Together, all these people are called a Class or Class Members. One Court and one Judge resolve the issues for all Class Members.

## **4. Why is there a Settlement?**

The Court did not decide in favor of Plaintiffs or Defendant. Instead, Plaintiffs negotiated a settlement with Defendant that allows both Plaintiffs and Defendant to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Settlement Class Members to obtain payment and/or other benefits without further delay. The Class Representatives and their attorneys think the Settlement is best for all Settlement Class Members. This Settlement does not mean that Defendant did anything wrong.

## **5. Am I part of the Settlement?**

You are part of this Settlement as a "Settlement Class Member" if you are a citizen of California who used FPA's website to book an appointment between June 29, 2019, and May 14, 2024.

## **6. What Benefits does the Settlement provide?**

If the Settlement is approved by the Court, FPA will pay \$1,450,000 (“Cash Settlement Amount”) for distribution to the Class. The Cash Settlement Amount will be used to pay all valid claims submitted by Settlement Class Members, as well as any Service Awards to the Class Representatives (up to \$9,000, each). Defendant will pay any attorneys’ fees and costs separately and in addition to the Cash Settlement Amount.

FPA will also provide to each Settlement Class Member who submits a valid claim form \$100 in restitution in the form of a voucher to use in payment or part-payment for any future visit to FPA or any good or service provided by FPA within 2 years of the date when the settlement is final, i.e., the Court has finally approved the settlement and no appeals have been filed or, in the event of an appeal, the judgment is affirmed in its entirety.

## **7. How much will my payment be, and what else will I receive?**

Each Settlement Class Member may make a claim for payment of a *pro rata* share of the Cash Settlement Amount, after deduction of any Court-approved Service Awards for the Class Representatives. The specific amount of payment depends on how many Settlement Class Members submit valid claims. Assuming a claims rate of between 5% and 7%, each Settlement Class Member who submits a valid claim will be eligible to receive between \$149 and \$208.

## **8. How do I get benefits from the Settlement?**

To ask for a payment and/or other benefit, you must complete and timely submit a Claim Form.

Claim Forms are available at [www.FPAsettlement.com](http://www.FPAsettlement.com). Claim Forms may be submitted online or printed and mailed to the Settlement Administrator at 1650 Arch St, Suite 2210 Philadelphia, PA 19103, no later than **March 12, 2026**.

## **9. How will claims be decided?**

The Settlement Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Settlement Administrator may require additional information from any claimant and will specify a time within which any such additional information must be provided.

Additional information regarding the claims process can be found in Sections V, VI, and VII of the Settlement Agreement, available at [www.FPAsettlement.com](http://www.FPAsettlement.com).

## 10. When will I get my payment?

The Court will hold a Final Approval Hearing at **2:30 p.m. on April 14, 2026**, to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably and resolving them can take time. It also takes time for all the Claim Forms to be processed, depending on the number of claims submitted and whether any appeals are filed. Please be patient.

## 11. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want a payment and/or other benefit **you must timely submit a Claim Form online or by printing and mailing it**, as described in Question 8, above, by **March 12, 2026**.

## 12. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims being resolved by this Settlement. The specific claims you are giving up against Defendant are described in Section XVI of the Settlement Agreement. You will be “releasing” Defendant and all related people or entities as described in Sections I.11 and XVI of the Settlement Agreement. The Settlement Agreement is available at [www.FPAsettlement.com](http://www.FPAsettlement.com).

The Settlement Agreement describes the released claims with specificity, so read it carefully. If you have any questions about what this means you can talk to the attorneys at the law firm listed in Question 13 for free or you can, of course, talk to your own lawyer at your own expense.

## 13. Do I have a lawyer in this case?

Yes. The Court appointed Julian Hammond, Ari Cherniak and Polina Brandler of HammondLaw, P.C. as Class Counsel:

HammondLaw, P.C.  
[www.hammondlawpc.com](http://www.hammondlawpc.com)  
1201 Pacific Avenue, 6th Floor  
Tacoma, Washington 98402  
(310) 807-1666

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

## 14. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys’ fees. Class Counsel will also ask the court to award costs and expenses of up to \$75,000.

FPA will pay these attorney's fees, costs and expenses separately from the Cash Settlement Amount.

## 15. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The deadline for opting-out of the Settlement is **March 12, 2026**.

To opt-out from the Settlement, you must submit a written request via the Settlement website [www.FPAsettlement.com](http://www.FPAsettlement.com) or by U.S. mail at the below address. The opt-out request must contain:

- (i) the Class Members full name, address, telephone number or email address, and signature;
- (ii) the words "Request for Exclusion" at the top of the document;
- (iii) the following statement: "I wish to be excluded from the Settlement of this case, *Jane Doe I and Jane Doe II v. Family Planning Associates Medical Group, Inc.*, No. 23CV037304."

The request to opt-out must be made only for the individual whose personal signature appears on the request.

If you exclude yourself, you are stating to the Court that you do not want to be part of the Settlement. You will not be eligible to receive any payment or benefit from this Settlement if you exclude yourself.

If submitted electronically, at [www.FPAsettlement.com](http://www.FPAsettlement.com) the opt-out request must be submitted no later than 11:59 p.m. PST on **March 12, 2026**.

If submitted by U.S. mail, at the below address, any written request to opt-out must be postmarked no later than **March 12, 2026**.

**FPA Settlement Administrator**  
ATTN: Exclusion Request  
PO Box 58220  
Philadelphia, PA 19102

## **16. How do I tell the Court that I do not like the Settlement?**

If you are a Settlement Class Member, you can object to the Settlement if you do not like it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must submit to the Settlement Administrator a written notice stating that you object to the Settlement in *Jane Doe I and Jane Doe II v. Family Planning Associates Medical Group, Inc.*, No. 23CV03730.

Your objection must:

- (i) set forth the Settlement Class Member's full name, current address, telephone number, and email address;
- (ii) contain the Settlement Class Member's original signature;
- (iv) state that the Settlement Class Member objects to the Settlement, in whole or in part;
- (v) set forth a statement of the legal and factual basis for the Objection;
- (vi) provide copies of any documents that the Settlement Class Member wishes to submit in support of his/her position;
- (vii) identify all counsel representing the Settlement Class Member, if any;
- (viii) contain the signature of the Settlement Class Member's duly authorized attorney or other duly authorized representative, along with documentation setting forth such representation; and
- (ix) contain a list, including case name, court, and docket number, of all other cases in which the objector and/or the objector's counsel has filed an objection to any proposed class action settlement.

Your objection must be mailed to the Settlement Administrator and postmarked no later than **March 12, 2026**, at the following address.

**FPA Settlement Administrator**  
ATTN: Objections  
PO Box 58220  
Philadelphia, PA 19102

An objecting Settlement Class Member has the right, but is not required, to attend the Final Approval Hearing. If you intend to appear at the Final Approval Hearing through counsel, you must also identify the attorney(s) representing you who will appear at the Final Approval Hearing

and include the attorney(s) name, address, phone number, e-mail address, state bar(s) to which counsel is admitted, as well as associated state bar numbers.

If you fail to timely submit an Objection, you will not be permitted to object to the approval of the Settlement at the Final Approval Hearing and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

### **17. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a Final Approval Hearing at **2:30 p.m. on April 14, 2026**, in Department 21 of the Alameda Superior Court, located at 1225 Fallon Street Oakland, CA 94612. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed written objections and may also listen to people who have asked to speak at the hearing (*see* Question 16). The Court will also decide whether to approve the service award to the Class Representatives.

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

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

### **19. What happens if I do nothing?**

If you do nothing, you will not receive any compensation from this Settlement. If the Court approves the Settlement, you will be bound by the Settlement Agreement and the Release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or related parties about the issues involved in the Lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

### **20. Are more details about the Settlement available?**

Yes. This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at [www.FPAsettlement.com](http://www.FPAsettlement.com).

### **21. How do I get more information?**

Go to [www.FPAsettlement.com](http://www.FPAsettlement.com), call 1-884-314-4124, or contact Class Counsel (*see* Question 13).

*Please do not call the Court or the Clerk of the Court for additional information.  
They cannot answer any questions regarding the Settlement or the Lawsuit.*