

Public Notice of Class Action Settlement

What Case Is Being Settled?

Danielle Paul and Robert Guenther v. Rogers Behavioral Health System, Inc., Case No. 23CV1572, State of Wisconsin, Dane County Circuit Court.

Who Is Settling the Case?

Plaintiffs Danielle Paul and Robert Guenther ("Plaintiffs") and Rogers Behavioral Health System, Inc. ("Defendant").

What Is This Case About?

In the case, Plaintiffs allege that the Defendant did not obtain sufficient consent when placing third party analytics tools, cookies, and pixels on their websites, including, for example, rogersbh.org, ("Informational Websites"). Plaintiffs allege that when using the Informational Websites, code on the Informational Websites caused the Plaintiffs' internet browsers to disclose information to third parties about Plaintiffs' internet use through these analytics tools, cookies, pixels, and related technologies. The Defendant denies any wrongdoing.

What Is This Case NOT About? This case does not involve your medical record, any identity fraud, security breach, unauthorized use of Social Security or driver's license numbers, or any donor or financial information.

Rogers BHS Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

«ScanString»

Postal Service: Please do not mark barcode

Notice ID: «Notice ID»

Confirmation Code: «Confirmation Code»

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«City», «StateCd» «Zip»

«CountryCd»

NOTICE ID: «NOTICE ID» «FIRST NAME» «LAST NAME» «ADDRESS»	ROGERS PIXEL SETTLEMENT CLAIM FORM	«Barcode»
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If you wish to participate in the settlement, please complete and submit this claim form by **September 2, 2024**. To complete this form, provide the information below and execute the certification.

1. I am/was a Patient of the Defendant between May 23, 2017 and May 3, 2024: YES NO
2. I visited the Informational Websites between May 23, 2017 and May 3, 2024: YES NO

The final amount per class member will depend on the total number of valid claim forms received.

PAYMENT SELECTION (select one of the following):

- PayPal Venmo Zelle Virtual Prepaid Card Check

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

CERTIFICATION:

By checking the box below and submitting this Claim Form, I certify and affirm that the information I am providing is true and correct to the best of my knowledge and belief, I am over the age of 18 and I wish to claim my share of the Settlement Fund.

- I acknowledge the information above is accurate.

Signature: _____ **Printed Name:** _____ **Date:** _____

Who Is in The Class? The **Settlement Class** is defined as “All Persons who, are, or have been, patients of Defendant and who visited Defendant’s website(s) at least once between May 23, 2017, and May 3, 2024. Excluded from the Class is Rogers and its affiliates, parents, subsidiaries, officers, and directors, as well as the judge(s) presiding over this matter and the clerks of said judge(s).

- A **Person** is a living natural person who is not an employee of the Defendant (or otherwise excluded from the class) and who is a resident of the United States.
- **Patient** is defined as any Person who obtained medical care from any of the Defendant healthcare providers during the Class Period.
- **Websites** are defined as websites on the domains or subdomains owned or operated by the Defendant (including, without limitation, rogersbh.org). The Websites do not require any type of registration or account creation and do not require any website visitor to provide proof of identity or to otherwise self-identify.

Can I Make a Claim? If you believe you are a class member you can fill out a short claim form and receive an equal share/pro rata distribution from a \$650,000 settlement fund. The amount you receive will depend on the number of valid claims filed. This fund will also be used to pay the costs of notifying people about the settlement, the costs of using a third party to administer the settlement, the lawyers’ fees, and awards to the Plaintiffs who brought the lawsuit. **The deadline to file a claim form is September 2, 2024.**

- Any funds remaining in the net settlement fund after the above distribution(s) will be distributed to the designated cy pres recipient approved by the Court.
- No portion of the Settlement Fund can be returned to the Defendant.

What Are My Options If I Believe I Am a Class Member?

SUBMIT A CLAIM FORM: The only way to get payment. You must submit a valid claim form online no later than September 2, 2024 (www.rbhpixelsettlement.com).

OBJECT: Write to the Court about why you do not like something about the Settlement no later than July 17, 2024. There is no right to opt out of this settlement.

OPT OUT: To exclude yourself from the Class, you must mail or otherwise deliver a letter stating that you want to be excluded. You must mail or deliver your exclusion letter, postmarked no later than July 17, 2024, to: Rogers BHS Settlement, ATTN: Exclusion Request, PO Box 58220, Philadelphia, PA. 19102.

GO TO A HEARING ON AUGUST 12, 2024: You can ask to speak to the Court about your opinion of the Settlement. Written requests to speak must be received by the Court by August 12, 2024.

DO NOTHING: You will not receive any monetary compensation. Your legal rights will be compromised.

This Notice is only a summary. Visit www.rbhpixelsettlement.com for more information.

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