

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

In the Circuit Court of Sangamon County, State of Illinois
Michael Feeler v. Wyssta Services, Inc., Case No. 2026LA000050

Did you hold an account at my.deltadentalcoversme.com between January 23, 2021, and January 23, 2025? A proposed class action settlement may affect your rights and entitle you to a cash payment.

A state court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Wyssta Services, Inc. (the “Defendant” or “Wyssta”) in a class action lawsuit about whether Wyssta violated the Electronic Communications Privacy Act and Illinois Eavesdropping Statute when it allegedly installed and implemented advertising and analytics tracking technologies, such as cookies and pixels, on a website Wyssta operates for Delta Dental plan members, my.deltadentalcoversme.com, without users’ knowledge or consent.
- The lawsuit is captioned *Michael Feeler v. Wyssta Services, Inc.*, Case No. 2026LA000050 (Circuit Court of Sangamon County, State of Illinois).
- The Defendant denies the allegations and all liability or wrongdoing with respect to any and all facts and claims alleged in the lawsuit. No judgment or determination of wrongdoing has been made.
- The parties have agreed to settle the lawsuit (the “Settlement”) to avoid the costs and risks, disruptions, and uncertainties of continuing the lawsuit.
- You are included in this Settlement if you are a Settlement Class Member. A Settlement Class Member is a natural person in the United States who, between January 23, 2021, and January 23, 2025, held an account on the online healthcare portal located at: <https://my.deltadentalcoversme.com>.
- As a Settlement Class Member, your rights are affected whether you act or don’t act. ***Please read this Notice carefully and completely.***

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive payment from this Settlement is by submitting a valid and timely Claim Form. You can submit your Claim Form online at www.wysstaservicesclassaction.com or print a Claim Form from the Settlement Website and mail it to the Settlement Administrator.	August 20, 2026
OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can elect to retain your own legal counsel at your own expense. If you opt out, you will not be able to receive a payment under the Settlement and you will <u>not</u> be bound by the terms of the Settlement Agreement.	August 20, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don’t like the Settlement. You may also ask the Court for permission to speak about your Objection at the Final Approval Hearing. If you object, you may also submit a Claim Form.	August 20, 2026
DO NOTHING	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not get a payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

Basic Information

- 1. Why was this Notice issued?..... 3
- 2. What is this lawsuit about?..... 3
- 3. What is a class action?..... 3
- 4. Why is there a Settlement?..... 3

Who is in the Settlement?

- 5. Who is included in the Settlement?..... 3
- 6. Are there exceptions to being included?..... 3

The Settlement Benefits

- 7. What can I get from this Settlement?..... 4
- 8. What claims am I releasing if I stay in the Settlement Class?..... 4

How to get a Payment – Making a Claim

- 9. How do I submit a Claim Form to get a Settlement Class Member Payment?..... 4
- 10. What is the deadline for submitting a Claim Form?..... 4
- 11. When will I get my Settlement Class Member Payment?..... 4

The Lawyers Representing You

- 12. Do I have a lawyer in this case?..... 4
- 13. Should I get my own lawyer?..... 5
- 14. How will the lawyers be paid?..... 5

Excluding Yourself from the Settlement

- 15. How do I opt out of the Settlement?..... 5

Objecting to the Settlement

- 16. How do I tell the Court if I do not like the Settlement?..... 5
- 17. What is the difference between objecting and opting out?..... 6

The Court’s Final Approval Hearing

- 18. When is the Court’s Final Approval Hearing?..... 6
- 19. Do I have to come to the Final Approval Hearing?..... 6

If You Do Nothing

- 20. What happens if I do nothing at all?..... 7

Getting More Information

- 21. How do I get more information?..... 7

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit and about all of your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is captioned *Michael Feeler v. Wyssta Services, Inc.*, Case No. 2026LA000050 (Circuit Court of Sangamon County, State of Illinois). The person that filed this lawsuit is called the “Plaintiff” (or “Representative Plaintiff”) and the company he sued, Wyssta Services, Inc. (Wyssta), is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that Wyssta violated the Electronic Communications Privacy Act and the Illinois Eavesdropping Statute when Wyssta allegedly installed and implemented advertising and analytics tracking technologies, such as cookies and pixels, on a website it operates for Delta Dental plan members, my.deltadentalcoversme.com, without users knowledge or consent—including on the portion of the website that Delta Dental plan members used to log into using their Delta Dental credentials between January 23, 2021 and January 23, 2025.

Wyssta denies all of the Plaintiffs’ claims and maintains that it did not do anything wrong. Wyssta has agreed to this Settlement to avoid the costs and risks, disruptions, and uncertainties of ongoing litigation.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as “Class Representatives,” Representative Plaintiffs, or Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Settlement, the Representative Plaintiff is Michael Feeler.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or Wyssta. Wyssta denies all claims and contends that it has not violated any laws. The Plaintiff and Wyssta agreed to a Settlement to avoid the costs and risks of a trial and, through the Settlement, Settlement Class Members are eligible to Settlement Class Member Payments. The Plaintiff and his attorneys, who also represent Settlement Class Members as “Class Counsel,” think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all persons in the United States who, between January 23, 2021, and January 23, 2025, held an account on the online healthcare portal located at: <https://my.deltadentalcoversme.com>.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) Defendant and its respective officers and directors; (2) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; (3) the Judge and Magistrate Judge, including their staff and immediate members of the Judge’s family, assigned to evaluate the fairness of this Settlement; and (4) Class Counsel.

THE SETTLEMENT BENEFITS

7. What can I get from this Settlement?

If approved by the Court, the Defendant has agreed to pay up to approximately \$12,670,284 as a Settlement Fund. The Settlement Fund will be used to pay up to \$16.50 to each Settlement Class Member who submits a valid Claim Form, as well as Notice and Settlement Administration Costs, attorneys' fees, costs, and expenses incurred by Class Counsel, and a Service Award for the Representative Plaintiff who filed the lawsuit on behalf of the class, as approved by the Court. The Settlement Administrator will make Settlement Class Member Payments pursuant to the Settlement Agreement.

Each Settlement Class Member who submits a valid Claim Form will be entitled to a \$16.50 cash payment, unless the number of Valid Claims exceeds the balance of the Settlement Fund after payment of the above costs, fees, and award (the "Net Settlement Benefit Cap"), in which case the amount of each Settlement Class Member Payment will be reduced *pro rata* (proportionally).

8. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant or Released Parties about any of the legal claims this Settlement resolves. The "Releases" section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.wysstaservicesclassaction.com/documents.

HOW TO GET A PAYMENT – MAKING A CLAIM

9. How do I submit a Claim Form to get a Settlement Class Member Payment?

Claim Forms may be submitted online by **August 20, 2026** at www.wysstaservicesclassaction.com or mailed to the Settlement Administrator, postmarked by **August 20, 2026**, at: *Feeler v. Wyssta Services, Inc.*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.

10. What is the deadline for submitting a Claim Form?

If submitting a Claim Form online, you must do so by **August 20, 2026**. If you submit a Claim Form by U.S. mail, the completed and signed Claim Form must be postmarked by **August 20, 2026**.

11. When will I get my Settlement Class Member Payment?

The short answer is – after the Settlement is "finally approved" and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **September 9, 2026, at 1:00 p.m.**, to decide whether to approve the Settlement, the attorneys' fees, costs, and expenses for Class Counsel for representing the Settlement Class, and the Service Award to the Representative Plaintiff who brought this action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Class Member Payments will be distributed as soon as possible, if and when the Court grants final approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court appointed Eric S. Dvoskin and Nicholas F. Wasdin of Dvoskin Wasdin LLP to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

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

13. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel's attorneys' fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the Court. Class Counsel will request payment of attorneys' fees and costs not to exceed \$2,500,000 (approximately 19.74% of the Settlement Benefit Cap), and a Service Award of \$3,000 for the named Representative Plaintiff.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. How do I opt out of the Settlement?

If you do not want to receive a Settlement Class Member Payment, and you want to keep your right 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 Opt-Out Date to submit a request for exclusion from the Settlement is **August 20, 2026**.

To exclude yourself from the Settlement, you must submit a written Opt-Out Notice to the Settlement Administrator that includes the following information:

- The case name and number: *Michael Feeler v. Wyssta Services, Inc.*, Case No. 2026LA000050;
- Your name and address;
- A clear and unambiguous statement indicating that you want to opt out of the Settlement Class, such as, "I wish to be excluded from the Settlement Class in *Michael Feeler v. Wyssta Services, Inc.*, Case No. 2026LA000050"; and
- Your signature.

Your Opt-Out Notice must be mailed to the Settlement Administrator at the address below, postmarked no later than **August 20, 2026**.

Feeler v. Wyssta Services, Inc.
c/o Kroll Settlement Administration LLC
ATTN: Opt-Out Notice
P.O. Box 225391
New York, NY 10150-5391

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You may only exclude yourself – not any other person.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member benefits, the request for attorneys' fees, costs, and expenses or Service Award payment, the releases provided to Wyssta, or some other aspect of the Settlement. Through an Objection, you give reasons why you think the Court should not approve the Settlement.

For an Objection to be considered by the Court, it must include:

- Your full name, current mailing address, telephone number, and email address;
- Proof that you are a member of the Settlement Class (e.g., a copy of your Notice or an attestation of membership);

- A statement of whether you object to the Settlement, in whole or in part (i.e., the entire Settlement or just a portion of it);
- A statement of the legal and factual basis for your Objection;
- Copies of any documents that you wish to submit in support of your position;
- The identity of all counsel representing you in connection with the Objection, if any;
- A list, including case name, court, and docket number, of all other cases you and/or your counsel have filed an objection to any proposed class action settlement in the past three (3) years;
- A statement whether you and/or your counsel will appear at the Final Approval Hearing; and
- Your original signature and the signature of your duly authorized attorneys or representative.

Objections must be filed with the Court no later than **August 20, 2026** or mailed to Class Counsel and Defendant’s Counsel postmarked no later than **August 20, 2026**.

COURT	CLASS COUNSEL	DEFENDANT’S COUNSEL
Clerk of the Court 200 South Ninth Street Springfield, IL 62701	Eric S. Dvoskin, Esq. Dvoskin Wasdin LLP 433 Plaza Real, Ste. 275 Boca Raton, FL 33432 —and— Nicholas F. Wasdin, Esq. Dvoskin Wasdin LLP 110 N. Wacker, Ste. 2500 Chicago, IL 60606	Jad Sheikali Shook, Hardy & Bacon LLP 111 South Wacker Dr., Ste. 4700 Chicago, IL 60606

17. What is the difference between objecting and opting out?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself/opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT’S FINAL APPROVAL HEARING

18. When is the Court’s Final Approval Hearing?

The Court is scheduled to hold a Final Approval Hearing on **September 9, 2026, at 1:00 p.m.**, in the Circuit Court of Sangamon County, Illinois before Hon. Judge Gail Noll (Zoom ID: 269 739 8957; Passcode:903784), to decide whether to approve the Settlement, attorneys’ fees, costs, and expenses to award to Class Counsel for representing the Settlement Class, and whether to award a Service Award to the Class Representative who brought this action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.wysstaservicesclassaction.com for updates.

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

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an Objection, you may, but you do not have to come to the Final Approval Hearing to talk about it. If you file your written Objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement and will not be eligible to receive a Settlement Class Member Payment.

GETTING MORE INFORMATION

21. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.wysstaservicesclassaction.com/documents.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (833) 930-1183 or by mail at *Feeler v. Wyssta Services Inc.*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.

PLEASE DO NOT CONTACT THE COURT OR DEFENDANT.