

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Afrika Williams v. Duke University Health System, Inc., Case No. 1:22-cv-00727 (M.D.N.C.)

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 If You Logged into the Duke MyChart Patient Portal or MyDuke Health mobile app Between February 18, 2019 And June 17, 2022.

In the Lawsuit, Plaintiff Claims that Defendant’s Alleged Use of a Tracking Tool on its Website May Have Led To The Disclosure Of Certain Personal Or Health-Related Information To A Vendor When She And Others Visited Defendant’s Website. Defendant Denies Any Wrongdoing And All The Claims Asserted Against It, And The Court Has Not Ruled That Defendant Did Anything Wrong.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM BY August 16, 2026	If you submit a Claim Form by Claims Response Deadline: August 16, 2026 , 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. IF YOU DO NOTHING , you will not receive Settlement benefits, but you will still be bound by the Settlement.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY July 20, 2026	You will receive no benefits, but you will retain any legal claims you may have against Duke University Health System, Inc. (“Duke Health”).
OBJECT BY July 20, 2026	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 August 27, 2026 at 9:30 ET	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”), *Afrika Williams v. Duke University Health System, Inc.*, Case No. 1:22-cv-00727, pending in the U.S. District for the Middle District of North Carolina (the “Court”). The Settlement would resolve Litigation alleging that because Duke Health used certain Internet tracking technology supplied by a third party on its website, including a piece of code known as a “pixel” (referred to herein as “Tracking Tools”), certain personal or health-related information may have been disclosed to a vendor when patients used the Duke Health website. Duke Health 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 Epip.

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.

QUESTIONS? VISIT WWW.DUHSSETTLEMENT.COM

3. What is this lawsuit about?

The Litigation arises out of Duke Health's use of Tracking Tools on its website, which Plaintiff alleges caused their web usage data containing patient's personal or health-related information to potentially be shared with a third party vendor, thereby allegedly resulting in the invasion of Plaintiffs' and Settlement Class Members' privacy (referred to herein as the "Pixel Disclosure"). Plaintiff alleges that the "Pixel Disclosure" occurred between February 18, 2019, and June 17, 2022. Duke Health 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.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a "Class Representative" ("Afrika Williams") 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 Duke Health to make a payment into a Settlement Fund that will be used to provide cash compensation to Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by Duke Health and does not imply that there has been, or would be, any finding that Duke Health violated the law. The Court overseeing the Litigation has not determined that Duke Health 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?

You are a member of the Settlement Class if you reside in the United States and you are among the individuals who Duke Health identified as having logged into the Duke MyChart patient portal or MyDuke Health mobile app at least once between February 18, 2019, and June 17, 2022 ("Settlement Class").

Excluded from the Class are (i) Duke Health, and Duke Health's affiliates, parents, subsidiaries, officers, and directors; (ii) any judge, justice, or judicial officer presiding over the Litigation and the members of their immediate families and clerks of said judge(s); and (iii) any individual who timely and validly excludes themselves from the Settlement. 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 from the Settlement Administrator 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 submit 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 \$3,743,600 Settlement Fund following the

payment of Notice and Settlement Administration Costs, CAFA Notice Costs, Class Representative Service Award of (\$7,500 for one Class Representative), and Attorneys' Fees and Expenses Award (fees up to 33% of the Settlement Fund or \$1,235,388, plus expenses up to \$30,000.00), subject to the Court's approval.

*****To receive Settlement benefits, you must submit a Claim Form by August 16, 2026.*****

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.DUHSSettlement.com, or by mail to

Williams v. Duke University Health System, Inc.
Settlement Administrator
PO Box 4214
Portland, OR 97208-4214

You must submit any claims by **August 16, 2026**. 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 Duke Health 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 Duke Health about or arising from the claims or issues in this Litigation, Duke Health's 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 Duke Health, 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 *Afrika Williams v. Duke University Health System, Inc.*, Case No. 1:22-cv-00727 (M.D.N.C.) to the Settlement Administrator. Such notice must include: (1) the case name and number of the Litigation (*Afrika Williams v. Duke University Health System, Inc.*, Case No. 1:22-cv-00727); (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 **July 20, 2026**, to:

Williams v. Duke University Health System, Inc.
Settlement Administrator
PO Box 4214
Portland, OR 97208-4214

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 Duke Health over the claims raised in the Litigation.

QUESTIONS? VISIT WWW.DUHSSSETTLEMENT.COM

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

CR Legal Team, LLC
c/o Peter H. Burke and James R. Harrell
2400 Freeman Mill Road, Suite 200
Greensboro, NC 27406

Lockridge Grindal Nauen P.L.L.P.
c/o Karen Hanson Riebel, Kate M. Baxter-Kauf
and Maureen Kane Berg
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401

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 33% of the Settlement Fund or \$1,235,388, plus their expenses incurred in the Litigation up to \$30,000. 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 object to the Settlement, or some part of it, and the Court will consider your views. In order to object to the Settlement, you must file with the Court 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: (1) your full name, telephone number, address, and email address; (2) a statement indicating the basis for your belief that you are a member of the Settlement Class; (3) the case name and number of the Litigation (*Afrika Williams v. Duke University Health System, Inc.*, Case No. 1:22-cv-00727 (M.D.N.C.)); (4) a statement about whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (5) all grounds for the objection, with any factual and legal support for the stated objection, including any supporting materials; (6) 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; (7) a statement of whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through your attorney; and (8) your personal and original signature.

You should also serve upon Class Counsel and Defendant's Counsel a copy of any objection you file with the Court.

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; (2) a description of any documents or evidence that you intend to offer at the Final Approval Hearing, and (3) a list, including case name, court, and docket number, of all other cases in which you or your attorney have filed an objection to any proposed class action settlement in the past three (3) years.

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, as noted below:

United States District Court for the
Middle District of North Carolina
Durham Division
John Hervey Wheeler Courthouse
323 E. Chapel Hill Street
Durham, North Carolina 27701

Mailing Address:
P.O. Box 1091
Durham, NC 27701

and serving a copy of the filed objection on Class Counsel and Defendant's counsel at the following addresses:

Kate Baxter-Kauf
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55410
(612) 339-6900
kmbaxter-kauf@locklaw.com

Elizabeth A. Scully
BAKER & HOSTETLER LLP
Washington Square, Suite 1100
1050 Connecticut Avenue,
N.W. Washington, DC 20036-5304
(202) 861-1500
escully@bakerlaw.com

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 **August 27, 2026 at 9:30 am ET** in the courtroom of the Honorable William L Osteen, Jr., which is located at 324 W. Market St., Greensboro, North Carolina 27401. 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 RECEIVE 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.DUHSSettlement.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 Duke Health Or Its Counsel. All Questions About The Settlement Should Be Referred To The Settlement Administrator Or Class Counsel