

Valladolid v. Memorial Health Services
Superior Court of the State of California, County of Los Angeles
Case No. 23STCV05059

If You Accessed The Memorial Health Services MyChart Patient Portal Between March 7, 2022 and July 8, 2022, You May Be Entitled to a Payment From a Class Action Settlement.

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

- A settlement has been reached in a class action lawsuit claiming that Defendant, Memorial Health Services, disclosed its patients’ personally identifiable information (“PII”) to third parties via the Meta Pixel and other tracking, analytics, and/or advertising technologies without consent in violation of the California Invasion of Privacy Act. Defendant denies all of Plaintiff’s claims in the lawsuit and maintains that it did nothing wrong, but have agreed to the settlement to avoid the expense, burden and uncertainties associated with continuing the case.
- You are included if you accessed the Memorial Health Services MyChart patient portal from March 7, 2022, to and through July 8, 2022.
- Persons included in the Settlement will be eligible to submit a Claim Form to receive a cash payment.
- Read this notice carefully. Your legal rights are affected whether you act, or don’t act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY AUGUST 21, 2026	This is the only way to receive a payment.
EXCLUDE YOURSELF BY AUGUST 21, 2026	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT BY JULY 15, 2026	Write to or email the Administrator explaining why you don’t like the Settlement.
GO TO THE HEARING BY SEPTEMBER 17, 2026	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You will not get a share of the Settlement benefits and will give up your rights to sue the Defendants about the claims in this case.

Your rights and options—**and the deadlines to exercise them**—are explained in this Notice.

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The case is called *Valladolid v. Memorial Health Services*, Case No. 23STCV05059, pending in the Superior Court of the State of California, County of Los Angeles. The person who sued is called the Plaintiff. The Defendant is Memorial Health Services.

2. What is a class action?

In a class action, one or more people called the class representative (in this case, Michelle Valladolid) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

3. What is this lawsuit about?

This lawsuit claims that Defendants violated the California Invasion of Privacy Act, Cal. Pen. Code § 631(a), by disclosing their patients’ personally identifiable information (“PII”) to third parties via the Meta Pixel and other tracking, analytics, and/or advertising technologies without consent. The Defendant denies all of Plaintiff’s claims in the lawsuit and maintains that it did nothing wrong.

4. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid timely claims will get compensation. The Representative Plaintiff and her attorneys believe the settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class and its members. The settlement does NOT mean that Defendant did anything wrong.

WHO’S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The **Settlement Class** is defined as:

All persons who between March 7, 2022, to and through July 8, 2022, accessed the Memorial Health Services patient portal.

Excluded from the Class are Memorial 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). This exclusion does not apply, and should not be read to apply, to otherwise eligible employees of Memorial and its Related Entities who do not timely submit valid notices of intent to opt out of being Settlement Class Members.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Monetary Relief: Each Settlement Class Member who files a valid claim will receive a cash payment. In addition, Defendants have agreed to pay the costs of notice and administration of the settlement, approved attorneys' fees and costs to Class Counsel, and an incentive award to the Class Representative. Any funds that are not distributed to Class Members will be distributed to the Legal Aid Foundation of Los Angeles.

A detailed description of the settlement benefits can be found in the [Settlement Agreement](#).

7. How much will my payment be?

You **must** submit a Claim Form (see instructions below) to receive a payment. **If you submit a valid Claim Form, you will receive a *pro rata* share of the net settlement fund, as described in the Settlement Agreement.**

You must provide proof of your Settlement Class membership when filing a claim by providing the unique Login ID and PIN on the notice you received by mail or e-mail. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please call 1-833-421-7255 to verify your identity and receive further information on how to file a claim.

8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for September 17, 2026. If the Court approves the settlement, eligible Class Members whose claims were approved by the Settlement Administrator will receive their payment 30 days after the Settlement has been finally approved and any appeals process is complete. The payment will be made in the form of a check, unless you elect to receive payment by PayPal, Venmo, or Zelle, and all checks will expire and become void 180 days after they are issued.

HOW TO GET BENEFITS

9. How do I get a payment?

You **must** complete and submit a Claim Form to receive a payment. You may submit a Claim Form either electronically on the Settlement Website

www.MHSpixelsettlement.com, or by printing and mailing in a paper Claim Form, copies of which are available for download at www.MHSpixelsettlement.com. Claim Forms must be submitted online by 11:59 p.m. CT on August 21, 2026 or postmarked and mailed by August 21, 2026.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Class?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims this Settlement resolve. The Settlement Agreement describes the specific claims you are giving up against the Defendants. You will be “releasing” the Defendants and certain of their affiliates described in Paragraph 74 of the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are “releasing” the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the “court documents” link on the website. Specifically, you will be deemed to have fully, finally, and forever completely released, relinquished, and discharged Defendant from any and all claims that were alleged, or reasonably could have been alleged, based on the facts and allegations in the operative complaint during the class period.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 12 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

11. What happens if I do nothing at all?

If you do nothing, you won’t get any benefits from this Settlement. But, unless you exclude yourself, you won’t be able to start a lawsuit or be part of any other lawsuit against the Defendants for the claims being resolved by this Settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed Philip L. Fraietta and Alec M. Leslie of Bursor & Fisher, P.A. and Scott R. Drury of Drury Legal, LLC to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

13. How will the lawyers and administrator be paid?

Class Counsel’s attorneys’ fees, costs, and expenses will be awarded by the Court and

paid from the settlement fund. Class Counsel is entitled to seek no more than \$250,000, but the Court may award less than this amount.

As approved by the Court, the Class Representative will separately be paid an incentive award by Defendants for helping to bring and settle the case. Class Representative Michelle Valladolid may seek up to \$2,500 as an incentive award, but the Court may award less than this amount.

THE SETTLEMENT ADMINISTRATOR

The Parties have selected Simpluris, Inc. as the settlement administrator. Simpluris will be paid not more than \$49,000 from the Settlement Fund as payment for administration of the settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must email, mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *Valladolid v. Memorial Health Services*, Case No. 23STCV05059 settlement. Your letter or request for exclusion must also include your name, your address, your signature, the name and number of this case, and a statement that you wish to be excluded. You must mail or deliver your exclusion request no later than **August 21, 2026** to:

MHS Pixel Privacy Settlement
P.O. Box 25226
Santa Ana, CA, 92799

15. If I don't exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself you will not be entitled to any benefits of the settlement, and you should not submit a Claim Form to ask for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

If you're a Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must submit a written or email objection to the Settlement Administrator stating that you object to the Settlement in *Valladolid v.*

Memorial Health Services, Case No. 23STCV05059 and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, and the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Defendants' Counsel listed below.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by July 1, 2026.

Settlement Administrator	Class Counsel	Defendants' Counsel
MHS Pixel Privacy Settlement P.O. Box 25226 Santa Ana, CA, 92799	Philip L. Fraietta Bursor & Fisher P.A. 1330 Avenue of the Americas, 32nd Floor New York, NY 10019	Paul G. Karlsgodt Baker & Hostetler LLP 1801 California Street, Suite 4400 Denver, CO 80202

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself from the Class is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing at 9:00 a.m. on September 17, 2026 in Department 17 at the Superior Court of the State of California, County of Los Angeles 312 North Spring Street, Los Angeles, CA 90012. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for an incentive award to the Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check www.MHSpixelsettlement.com or call 1-646-837-7150.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include in your letter or brief objecting to the settlement a statement saying that it is your "Notice of Intent to Appear in *Valladolid v. Memorial Health Services*, Case No. 23STCV05059." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than **July 15, 2026**, and be sent to the addresses listed in Question 17.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.MHSpixelsettlement.com. You may also write with questions to MHS Pixel Privacy Settlement, P.O. Box 25226, Santa Ana, CA, 92799. You can call the Settlement Administrator at 1-833-421-7255 or Class Counsel at 1-646-837-7150, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the case website.