

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Ahlers, et al., v. Allina Health System
United States District Court for the District of Minnesota
Case No. 0:24-cv-03674-SRN-ECW

THIS IS A COURT-AUTHORIZED NOTICE. IT IS NOT A NOTICE OF A LAWSUIT AGAINST YOU OR A SOLICITATION FROM A LAWYER.

YOU MAY BE ELIGIBLE TO PARTICIPATE IN A CLASS ACTION SETTLEMENT BECAUSE CERTAIN PERSONAL OR HEALTH-RELATED INFORMATION MAY HAVE BEEN DISCLOSED TO THIRD PARTIES IF YOU ACCESSED ALLINA HEALTH SYSTEM'S WEBSITES OR WEBPAGES AS A PORTAL USER, NON-PORTAL BILL PAY USER, AND NON-PORTAL SCHEDULING USER BETWEEN SEPTEMBER 16, 2018 AND MAY 11, 2026 OR AS A NON-PORTAL, NON-BILL PAY OR NON-SCHEDULING PATIENT BETWEEN SEPTEMBER 16, 2018 AND MAY 11, 2026. ALLINA HEALTH SYSTEM DENIES THESE ALLEGATIONS.

Please Read This Notice Carefully. Your legal rights may be affected.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY SEPTEMBER 8, 2026	You must submit a timely Claim Form to be eligible for a payment. This is the only option that provides compensation under the Settlement.
DO NOTHING	If you take no action, you will not qualify to receive a payment, you will remain bound by the Settlement, and give up your right to sue about the claims the Settlement resolves.
REQUEST EXCLUSION BY AUGUST 10, 2026	Ask to be excluded ("Opt-Out") from the Settlement and keep your right to sue about the claims resolved by this Settlement.
FILE AN OBJECTION BY AUGUST 10, 2026	Tell the Court why you do not agree with the Settlement. You must remain in the Settlement Class, and you can still submit a Claim Form if you object.
ATTEND THE FINAL APPROVAL HEARING ON SEPTEMBER 24, 2026	Ask to speak in Court about the Settlement. Attendance is not required to file an objection or submit a claim.

BASIC INFORMATION

1. What is this Notice?

This is a Court-authorized Long Form Notice of a proposed Settlement of a class action lawsuit (the “Action”) known as *Ahlers, et al. v. Allina Health System*, Case No. 0:24-cv-03674, pending in the United States District Court for the District of Minnesota (the “Court”).

The Settlement would resolve claims raised by Plaintiffs alleging that because Allina Health System (“Allina” or “Defendant”) used pixel tracking (referred to herein as “Pixels”) on its websites and webpages, certain personal or health-related information of the individuals who visited the websites and webpages may have been disclosed to third parties.

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, and the benefits available and how to receive them.

This Notice is only a summary of the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.AllinaPixelSettlement.com.

2. Why did I receive a Notice?

You received a Notice because Allina’s records indicate that you fit the description of the Settlement Class. The Court authorized that Notice be sent to Settlement Class Members because you have a right to know about the proposed Settlement of this class action lawsuit and about your rights and options before the Court decides whether to grant Final Approval of the Settlement.

3. What is this Lawsuit about?

The lawsuit arises out of Allina’s implementation of Pixels on its websites and webpages, which Plaintiffs allege caused personal and health-related information to be shared with third parties in violation of Settlement Class Members’ privacy, among other things.

4. Why is this a class action?

A class action is a type of lawsuit in which one or more individuals called “Class Representatives” (in this case, Jacqueline Ahlers, Cathy Gebhardt-Lally and Patrick Witt) bring a single lawsuit on behalf of other people who have similar claims. In a class action settlement, all 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?

The Parties agreed to the proposed Settlement to put the matter to rest without the expense, delay, and uncertainty of continued litigation. If approved by the Court, the Settlement will resolve all claims brought on behalf of the Settlement Class related to the potential disclosure of personal and health-related information because of the Pixels used by Allina.

The Settlement Agreement requires Allina to provide compensation to Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by Allina and does not imply that there has been, or would be, any finding that Allina violated the law. The Court overseeing this Action has not determined that Allina did anything wrong.

The Court already has preliminarily approved the Settlement Agreement. The Court conditionally certified the Settlement Class for settlement purposes only, so that members of the Settlement Class could be notified and given the opportunity to exercise their legal rights to exclude themselves or to voice their support or opposition to Final Approval of the Settlement Agreement. The Court must give Final Approval to the Settlement Agreement before it can be effective. 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.

WHO IS INCLUDED

6. Who is included in the Settlement Class?

The Settlement Class includes the following two groups of Class Members.

Group 1 Settlement Class Members are those individuals who were portal users, non-portal bill pay users, and non-portal scheduling users between SEPTEMBER 16, 2018 through MAY 11, 2026.

Group 2 Settlement Class Members are those individuals who were non-portal, non-bill pay, and non-scheduling patients between SEPTEMBER 16, 2018 through MAY 11, 2026.

The Settlement Class specifically excludes: (a) Defendant and its respective officers and directors; (b) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; and (c) the Judge and/or magistrate assigned to evaluate the fairness of this Settlement.

THE SETTLEMENT BENEFITS

7. What can I get from the Settlement?

Settlement Class Members who file valid and timely Claim Forms will be eligible to receive a pro rata payment.

Allina agreed to pay \$12,500,000.00 as part of the Settlement: \$10,303,098.00 to the Group 1 Settlement Fund and \$2,196,902.00 to the Group 2 Settlement Fund. The costs of Class Counsel's Attorneys' Fees and Expenses Award, Plaintiffs' Service Awards, and Notice and Settlement Administration Costs will be paid 82.42% from the Group 1 Settlement Fund and 17.58% from the Group 2 Settlement Fund. The amount remaining in each Settlement Fund will be paid *pro rata* to respective Group 1 and Group 2 Settlement Class Members who file Valid Claims.

8. When will I receive a payment?

If you timely submit a Valid Claim Form for a payment, you will receive payment in the amount approved by the Settlement Administrator once the Settlement is final and has become effective. A date for distribution of payments will not be known until sometime after the Final Approval Hearing. Please check the Settlement Website at www.AllinaPixelSettlement.com for updates.

9. How do I submit a Claim Form?

To submit a claim for a payment, you must timely complete and submit a Claim Form on the Settlement Website at www.AllinaPixelSettlement.com no later than SEPTEMBER 8, 2026, or download a Claim Form from the Settlement Website to print, complete, and submit by mail not later than SEPTEMBER 8, 2026, to:

Allina Pixel Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

CLAIM FORMS MUST BE SUBMITTED BY SEPTEMBER 8, 2026.

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

If you remain in the Settlement Class and the Settlement becomes final, you agree to give up your right to sue or be part of any other lawsuit or legal action against Allina and the other Released Parties about or arising from the claims or issues in this Lawsuit. The precise terms of the Released Claims and Released Parties can be found in the Settlement Agreement available on the Settlement Website at www.AllinaPixelSettlement.com.

REQUESTING EXCLUSION FROM THE SETTLEMENT

11. How do I exclude myself from the Settlement?

If you wish to exclude yourself or “Opt-Out” of the Settlement Class, you must send a written notice of your intention by mail to the Settlement Administrator’s office no later than AUGUST 10, 2026. The written notice must include: (a) reference to the case name and number of the Action - *Ahlers, et al. v. Allina Health System*, Case No. 0:24-cv-03674; (b) your full name, address, and telephone number; (c) your personal and original signature; and (d) a clear statement of your intent to be excluded from the Settlement Class. To be effective, an exclusion request must be only for the Settlement Class Member whose personal and original signature appears on the request. All Opt-Out requests must be submitted individually.

Written exclusion requests must be sent by mail by AUGUST 10, 2026, to:

Allina Pixel Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

If you submit a timely and valid exclusion request, you will not be part of the Settlement Class, you will not be eligible to submit a Claim Form for a payment, and you will not be bound by the terms of the Settlement Agreement.

OBJECTING TO THE SETTLEMENT

12. How do I object to the Settlement?

If you are a Settlement Class Member and you do not request exclusion, you can tell the Court why you do not like the Settlement or any part of it by filing an objection. To be effective, an objection must include: (a) the case name and number of the Action; (b) your full name, current address, telephone number, and email address; (c) your personal and original signature; (d) the name, address, telephone number, and email address of any attorney representing you or who assisted you in drafting your objection; (e) a statement indicating the basis for your belief that you are a Settlement Class Member; (f) a statement of whether the objection applies only to you, to a specific subset of the

Settlement Class, or to the entire Settlement Class; (g) a statement of the legal and/or factual basis for the objection; (h) a list, including case name, court, and docket number, of all other cases in which you or your counsel has filed an objection to any proposed class action settlement in the past three years; and (i) a statement of whether you intend to appear at the Final Approval Hearing and, if so, whether personally or through counsel.

If you are represented by counsel and such counsel intends to speak at the Final Approval Hearing, your written objection must also include: (a) the identity of any witnesses you intend to call to testify at the Final Approval Hearing, and (b) a description of any documents or evidence that you intend to offer at the Final Approval Hearing.

You must also send your objection by mail no later than AUGUST 10, 2026 to Defendant's Counsel and Class Counsel at the following addresses:

Defendant's Counsel

Nicole Moen
Maliya Rattliffe
Geoffrey Koslig

Fredrikson & Byron P.A.

60 South Sixth Street
Suite 1500
Minneapolis, MN 55402-4400

Class Counsel

David Almeida
Britany Wessan
Almeida Law Group
849 W. Webster Avenue
Chicago, IL 60614

Class Counsel

Brandon Wise
Andrew Tate

Peiffer Wolf Carr

Kane Conway & Wise
One US Bank Plaza, Suite 1950
St. Louis, MO 63101

Class Counsel

Grayson Wells
Stranch, Jennings & Garvey PLLC
223 Rosa L. Parks Ave., Suite 200
Nashville, TN 37203

Notice of an objection may also be filed with the Court no later than AUGUST 10, 2026, and submitted to the Court either by filing electronically or in person at any location of the United States District Court for the District of Minnesota or by mailing to the Court Clerk, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA, WARREN E. BURGER FEDERAL BUILDING AND U.S. COURTHOUSE, 316 ROBERT ST NORTH, SAINT PAUL, MN 55101.

For all Objections mailed to Class Counsel and Defendant's Counsel, Class Counsel will file them with the Court as an exhibit to Plaintiffs' Motion for Final Approval.

If you file an objection, you may still receive benefits under the Settlement so long as you timely and separately file a Valid Claim as explained above.

THE FINAL APPROVAL HEARING

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

The Court has already given preliminary approval to the proposed Settlement. The Court will hold a Final Approval Hearing on SEPTEMBER 24, 2026, at 9:30 A.M. (CT) in Courtroom 7B of the U.S. District Court for the District of Minnesota located at WARREN E. BURGER FEDERAL BUILDING AND U.S. COURTHOUSE, 316 ROBERT ST NORTH, SAINT PAUL, MN 55101.

At this hearing, the Court will consider the fairness of the Settlement and determine if it is fair, reasonable, and adequate and in the best interests of the Settlement Class. The Court will also consider whether any Attorneys' Fees and Expenses Award and Settlement Class Representative Service Awards should be approved. If there are Objections, the Court will consider them and hear any arguments concerning the fairness of the Settlement from any Settlement Class Members and their counsel who filed a notice of intent to appear.

You are not required to attend the hearing. The hearing may be postponed or changed without notice. Please check the Settlement Website at www.AllinaPixelSettlement.com for current information.

THE LAWYERS REPRESENTING THE SETTLEMENT CLASS

14. Do I have a lawyer in this case?

The Court has appointed the following attorneys to represent the Settlement Class as Class Counsel:

David Almeida
Britany Wessan
Almeida Law Group
849 W. Webster Avenue
Chicago, IL 60614

Brandon Wise
Andrew Tate
Peiffer Wolf Carr
Kane Conway & Wise
One US Bank Plaza, Suite 1950
St. Louis, MO 63101

Grayson Wells
Stranch, Jennings & Garvey PLLC
223 Rosa L. Parks Ave., Suite 200
Nashville, TN 37203

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

15. 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 \$4,166,666.67 (approximately one-third of the Settlement Fund). Class Counsel may also petition the Court for reimbursement of their costs of litigation, to be paid from the Settlement Fund. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed.

GETTING MORE INFORMATION

16. Where can I get more information?

This Notice is only a summary of the proposed Settlement. Complete details about the Settlement, including access to the Settlement Agreement and other documents filed with the Court, answers to frequently asked questions, and key dates and deadlines, can be found on the Settlement Website at www.AllinaPixelSettlement.com.

If your questions are not answered by the Settlement Website, you can contact the Settlement Administrator by phone at 1-800-956-7192 or email at AllinaPixelSettlement@atticusadmin.com.