

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
FOR RIVERSIDE MEDICAL CLINIC PATIENTS AND ANY OTHER PERSON WHO
VISITED THE WEBSITE, WWW.RIVERSIDEMEDICALCLINIC.COM BETWEEN
SEPTEMBER 9, 2017 AND DECEMBER 13, 2022.**

A Superior Court authorized this Long Form Notice. This is not a solicitation from a lawyer.

**THIS IS A NOTICE OF A 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 BECAUSE YOU ARE A RIVERSIDE MEDICAL CLINIC PATIENT OR OTHER
PERSON WHO VISITED THE WEBSITE, WWW.RIVERSIDEMEDICALCLINIC.COM
BETWEEN SEPTEMBER 9, 2017 AND DECEMBER 13, 2022.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM BY CLAIMS DEADLINE OF AUGUST 26, 2024	If you submit a Claim Form by August 26, 2024 , you may receive a <i>pro rata</i> share of the Net Settlement Fund as compensation for your damages. You must timely submit a Claim Form either via U.S. mail or online to receive cash payment under this Settlement. IF YOU DO NOTHING , you will not receive a Claim Payment, but you will be bound by the Settlement.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY THE OPT-OUT DATE OF JULY 29, 2024	You will receive no benefits, but you will retain your legal claims against the Defendant.
OBJECT BY THE OBJECTION DEADLINE OF JULY 29, 2024	Explain why you do not like the Settlement and mail the Objection Form to the Settlement Administrator at the address below. You must remain in the Settlement Class to object to the Settlement.
GO TO A HEARING ON AUGUST 23, 2024	Ask to speak in Court about the fairness of the Settlement.

1. What is this Long-Form Notice?

This is a Court-authorized Long-Form Notice of a proposed Settlement in a Class Action lawsuit, *Monica Bustos, et al. v. Riverside Medical Clinic*; Case No. CVRI2203466, pending in the Superior Court of the State of California, County of Riverside (the “Litigation”). The Settlement would resolve the Litigation that arose out of Riverside Medical Clinic’s (“RMC” or “Defendant”) use of internet tracking technologies supplied by Facebook, including pieces of code known as “pixels” (herein as “Meta Pixels”), and, when using some sites or applications, protected health information would be disclosed in particular circumstances to Facebook because of the Meta Pixels. The Court has granted Preliminary Approval of the Settlement and has conditionally certified the Settlement Class for purposes of Settlement only. This Long-Form Notice explains the nature of the class action lawsuit, the terms of the Settlement Agreement, and the legal rights and obligations of Settlement Class Members. Please read the instructions and explanations below carefully so that you can better understand your legal rights. The Settlement Administrator in this case is Kroll Settlement Administration LLC.

2. Why did I receive a notice of this Settlement?

You may have received a notice because you were identified as an individual who from September 9, 2017, through December 13, 2022, may have visited the website www.riversidemedicalclinic.com.

3. What is this Litigation about?

The Litigation arises out of RMC’s implementation and use of the Meta Pixel on RMC’s websites, defined below as the “Website Usage Disclosure”, during which Plaintiffs allege their web usage data, containing personal information, was shared to Facebook allegedly resulting in the invasion of Plaintiffs’ and Settlement Class Members’ privacy.

“Website Usage Disclosure” means the alleged disclosure of personal information and personal health information of Plaintiffs and members of the Settlement Class to Facebook as a result of RMC’s use of the Meta Pixel on its website, www.riversidemedicalclinic.com between September 9, 2017 and December 13, 2022.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a “Plaintiff” brings a single lawsuit on behalf of other people who have similar claims. 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 issues 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 resolves all claims brought on behalf of the Settlement Class related to the Meta Pixel. If approved by the Court, the Settlement Agreement requires RMC to provide Cash Compensation to certain Settlement Class Members who submit valid and timely Claim Forms. The Settlement is not an admission of wrongdoing by RMC and does not imply that there has been, or would be, any finding that RMC violated the law.

QUESTIONS? VISIT WWW.RIVERSIDEPixelSETTLEMENT.COM, OR CALL (833) 462-9176 TOLL FREE

The Court already has preliminarily approved the Settlement. This means the Court has determined there is sufficient evidence to suggest the Settlement is fair, reasonable, and adequate. Because the settlement of a class action determines the rights of all Settlement Class Members, 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 Settlement Class Members may be given notice and the opportunity to exclude themselves from the Settlement Class, and to voice their support or opposition to final approval of the Settlement. If the Court does not grant Final Judgment to the Settlement, 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 Settlement Class Member if you are/were an RMC patient or other person who from September 9, 2017, through December 13, 2022, visited the website www.riversidemedicalclinic.com (“Settlement Class”).

YOUR BENEFITS UNDER THE SETTLEMENT

7. What can I get from the Settlement?

Settlement Class Members who file a valid Claim Form may receive a *pro rata* Claim Payment of the Net Settlement Fund. The Net Settlement Fund is the funds that remain in the Settlement Fund after funds are paid from or allocated for payment from the Settlement Fund for the following: (i) reasonable Notice and Claims Administration Costs incurred pursuant to this Settlement Agreement, (ii) any taxes owed by the Settlement Fund, (iii) any service awards approved by the Court, and (iv) any Attorneys’ Fees, Costs, and Expenses Award approved by the Court. The estimated cash payment to each Settlement Class Member who makes a claim is \$38.83.

*****To receive benefits, you must submit a Claim Form.**

8. When will I receive the benefits?

If you timely submit a valid Claim Form for cash payment, you will receive payment in the amount approved by the Settlement Administrator after processing your Claim Form, and the Settlement is Final and has become effective.

9. I want to be a part of the Settlement. What do I do?

To submit a claim for cash payment, you must timely submit the Claim Form on the Settlement Website at www.riversidepixelsettlement.com, or by mail to *Settlement Administrator-83037*, c/o Kroll Settlement Administration LLC, PO Box 5324, New York, NY 10150-5324.

You must submit any claims by the Claims Deadline of August 26, 2024. There can be only one (1) valid and timely claim per Settlement Class Member.

QUESTIONS? VISIT WWW.RIVERSIDEPixelSETTLEMENT.COM, OR CALL (833) 462-9176 TOLL FREE

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

By staying in the Settlement Class, all the Court's orders will apply to you and will bind you, and you give Defendant a "release." A release means you cannot sue or be part of any other lawsuit or other legal action against Defendant Riverside Medical Clinic and its agents, officers, and affiliates about or arising from the claims or issues in this Litigation with respect to the disclosure of your personal information while visiting www.riversidemedicalclinic.com from September 9, 2017 through December 13, 2022.

The precise terms of the release are in the Settlement Agreement, which is available on the Settlement Website. You may also obtain the Settlement Agreement attached to the Declaration of John J. Nelson in support of Plaintiffs' Motion for Preliminary Approval filed on March 29, 2024, in the Superior Court of California for the County of Riverside, located at 4050 Main Street, Riverside, CA 92501 and accessible online via www.riverside.courts.ca.gov. Unless you formally exclude yourself from this Settlement, you will release your claims against Riverside Medical Clinic and its directors, employees, officers, and Riverside Medical Clinic Patient Services, LLC (who utilized Defendant's website), and Brand Savant (Defendant's website developer) relating to the Website Usage Disclosure while visiting www.riversidemedicalclinic.com from September 9, 2017 through December 13, 2022.

If you have any questions, you can talk for free to the attorneys 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.

11. How much will the Plaintiffs receive?

The Plaintiffs will seek a payment of \$3,500 each to the named Plaintiffs for their services to the Settlement Class. This payment is subject to the Court's approval and will be paid from the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to remain in the Settlement, but you want to keep your legal claims against Defendant, then you must take steps to exclude yourself from this Settlement.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must submit an Exclusion Form, a notice of your intent to opt-out, or letter by mail stating that you want to be excluded from *Monica Bustos, et al. v. Riverside Medical Clinic*; Case No. CVRI2203466 to the Settlement Administrator below. The written notice must clearly manifest your intent to opt-out of the Settlement Class. You must mail your written notice so that it is postmarked **no later than the Opt-Out Date of July 29, 2024**, to:

Settlement Administrator - 83037
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

13. If I exclude myself, do I still receive benefits from this Settlement?

No, if you submit a notice to opt-out, you will not receive anything resulting from the Settlement, but you may sue Defendant over the claims raised in this case, either on your own or as a part of a different lawsuit. If you exclude yourself, the time you have in which to file your own lawsuit (called the “statute of limitations”) will begin to run again. You will have the same amount of time to file the suit that you had when this case was filed.

THE LAWYERS REPRESENTING THE 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:

John J. Nelson and Alexander Wolf
Milberg Coleman Bryson Phillips Grossman, PLLC
280 S. Beverly Dr.
Beverly Hills, California 90212

These attorneys will be paid using funds from the Settlement Fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel will request to be paid reasonable attorneys’ fees not to exceed thirty-five (35%) of the Settlement Fund plus reasonable costs and expenses incurred in prosecuting the Litigation, subject to Court approval. The motion for Attorneys’ Fees and Expenses Award will be posted on the Settlement Website after it is filed.

OBJECTING TO THE SETTLEMENT

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

You can tell the Court that you do not agree with the Settlement or some part of it. If you are a Settlement Class Member, you can object to the Settlement and the Court will consider your views. In order to object to the Settlement, you must mail your Objection Form or written statement to the Settlement Administrator at the address below stating that you object and the reasons why you think the Court should not approve the Settlement. Your Objection should include: (1) (i) your full name, address, telephone number, and email address (if any); (ii) your original signature; (iii) proof that the Settlement Class Member is part of the Settlement Class (i.e., a statement signed under penalty of perjury attesting that you are a Settlement Class Member); (iv) a statement that you object to the Settlement, in whole or in part; (v) set forth a statement of the legal and factual basis for the Objection; (vi) copies of any documents that you wish to submit in support of your position; and (vii) identify all counsel representing you, if any. You may also appear at the Final Approval Hearing personally or through counsel and state your Objection orally at that time.

To be timely, your written Objection in the appropriate Objection Form must be mailed to the Settlement Administrator at its address noted below **no later than the Objection Deadline, July 29, 2024**:

Settlement Administrator - 83037
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

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.

17. 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.

The Court will hold a hearing on **August 23, 2024, at 8:30 a.m. PT** in the courtroom of the Superior Court of California, County of Riverside, 4050 Main St, Riverside CA 92501. 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 Plaintiffs. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement. After the hearing, the Court will 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 Long-Form 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.riversidepixelsettlement.com

If you have any questions, you can contact the Settlement Administrator at the phone number or Settlement Website below. You can update your contact information on the Contact page at the Settlement Website. In addition to the documents available on the Settlement Website, all pleadings and documents filed in this lawsuit may be reviewed or copied at the Clerk of Court's office.

DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO THE CLERK OF THE COURT OR TO THE JUDGE.

They are not permitted to answer your questions.

All questions about the Settlement shall be referred to the Settlement Administrator and/or Class Counsel.

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