

COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

Mohr, et al. v. The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine), Case No. 230102149

If You Accessed the myPennMedicine Patient Portal Between January 23, 2021, and January 23, 2023, 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, The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine), disclosed its patients' personally identifiable information ("PII") to third parties via tracking pixels by Meta Platforms, Inc., formerly known as Facebook, Inc. ("Meta"), Google LLC ("Google") and other providers of tracking, analytics, and/or advertising technologies without consent in violation of the Pennsylvania Wiretapping and Electronic Surveillance Control Act, 18 Pa. Cons. Stat. § 5701, *et seq.* (the "WESCA").
- Defendant denies all of Plaintiffs' claims in the lawsuit and maintains that it engaged in no wrongdoing but has agreed to the settlement to avoid the expense, burdens and uncertainties associated with continuing the case.
- You are included if between January 23, 2021, and January 23, 2023, you accessed the myPennMedicine patient portal and had a Pennsylvania address on file at the time of access, subject to certain exceptions. Please note that this definition of "Settlement Class Member" has been selected because records readily exist to determine settlement class membership. Defendant denies any access to, use of, or disclosure of health records.
- Persons included in the Settlement Class will be eligible to submit a Claim Form to receive a cash payment of up to \$15.00. Additionally, Defendant is not currently using the Meta pixel on the pennmedicine.org website and pursuant to the Settlement, will have its web governance committee assess the implementation and use of analytics and advertising technologies on the website. Moreover, while continuing to deny liability, Defendant agrees that for the next two years, Defendant will not use analytics and advertising technologies on pennmedicine.org unless the web governance committee determines that its use is consistent with applicable law at that time.
- 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 September 16, 2026	This is the only way to receive a payment up to \$15.00.
EXCLUDE YOURSELF BY September 1, 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 September 1, 2026	Submit a written objection explaining why you don't like the Settlement.

GO TO THE HEARING BY November 12, 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 Defendant 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 *Mohr, et al. v. The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine)*, Case No. 230102149, pending in the Court of Common Pleas of Philadelphia County. The people who sued are called the Plaintiffs. The Defendant is The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine).

2. What is a class action?

In a class action, one or more people called the class representatives (in this case, Johnathon Mohr, Anna Gallini, Samuel Best, Stephanine Cissorsky, Maya Shengold, Eli Steiker-Ginzberg, Daniel Winikur, Lisa Watt, Ian Zolitor, Markeita Reid, and Colin Powers) 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 Defendant violated the Pennsylvania Wiretapping and Electronic Surveillance Control Act, 18 Pa. Cons. Stat. § 5701, *et seq.* (the “WESCA”) by disclosing its patients’ personally identifiable information (“PII”) to third parties via the Meta and Google tracking pixels and other tracking, analytics, and/or advertising technologies without consent. Defendant denies all of Plaintiffs’ claims in the lawsuit and maintains that it engaged in no wrongdoing.

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 Plaintiffs and their 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 January 23, 2021, and January 23, 2023, accessed the myPennMedicine patient portal and had a Pennsylvania address on file at the time of access.

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 of up to \$15.00. In addition, Defendant has agreed to pay the costs of notice and administration of the Settlement, approved attorneys' fees and costs to Class Counsel, and incentive awards to the Class Representatives. Defendant has agreed to pay up to a total of \$9,250,000.

Prospective Relief: Additionally, Defendant is not currently using the Meta pixel on the pennmedicine.org website and pursuant to the Settlement, will have its Web Governance Committee assess the implementation and use of analytics and advertising technologies on the website. Moreover, while continuing to deny liability, Defendant agrees that for the next two years, Defendant will not use analytics and advertising technologies on pennmedicine.org unless the web governance committee determines that its use is consistent with applicable law at that time.

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 cash payment of up to \$15.00.**

You must provide proof of your Settlement Class membership when filing a claim by providing the unique Notice ID and Confirmation Code on the notice you received by e-mail. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please call 1-877-327-7567 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 November 12, 2026. If the Court approves the Settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will receive their payment 90 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 by clicking [here](#), or by printing and mailing in a paper Claim Form, copies of which are available for download [here](#). Claim Forms must be submitted online by 11:59 p.m. ET on September 16, 2026, or postmarked and mailed by September 16, 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 resolves. The Settlement Agreement describes the specific claims you are giving up against the Defendant. You will be “releasing” the Defendant and certain of its affiliates described in Section 1.25 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.

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 Defendant for the claims being resolved by this Settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

QUESTIONS? CALL 1-877-327-7567 TOLL FREE, OR VISIT www.uphspixelsettlement.com

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 be paid?

Class Counsel’s attorneys’ fees, costs, and expenses will be paid by Defendant and awarded by the Court. Class Counsel is entitled to seek no more than \$3,700,000, but the Court may award less than this amount.

As approved by the Court, the Class Representatives will be paid an incentive award by Defendant for helping to bring and settle the case. Class Representatives Mohr, Gallini, Cissorsky, Shengold, Steiker-Ginzberg, Winikur, Watt, Reid, and Powers may seek up to \$5,000 each, and Class Representatives Best and Zolitor may seek up to \$2,500 each as an incentive award, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *Mohr, et al. v. The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine)*, Case No. 230102149 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 **September 1, 2026**. to:

UPHS Pixel Settlement
Settlement Administrator
PO Box 4536
Portland, OR 97208-4536

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

No. Unless you exclude yourself, you give up any right to sue the Defendant 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 Settlement 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 should submit a written objection stating that you object to the Settlement in *Mohr, et al. v. The Trustees of The University of Pennsylvania as Owner and Operator of The University of Pennsylvania Health System (d/b/a Penn Medicine)*, Case No. 230102149 and identify your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your written objection should also include your name, an explanation of the basis upon which you claim to be a Settlement Class Member, 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. You should mail or deliver your written objection no later than September 1, 2026, to the Settlement Administrator at: UPHS Pixel Settlement, Settlement Administrator, PO Box 4536, Portland, OR 97208-4536.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by November 6, 2026.

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 21), you should say so in your written objection that you send to the Settlement Administrator no later than September 1, 2026.

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 Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement 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 via **Zoom** on November 12, 2026 . 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 Settlement Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for incentive awards to the Class Representatives. 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.uphspixelsettlement.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, 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 appear and ask the Court for permission to speak at the Fairness Hearing. You should include any such request in your written objection to the Settlement along with your name, address, telephone number and signature, as well as the name and address of your lawyer, is one I appearing for you.

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.uphspixelsettlement.com. You may also write with questions to UPHS Pixel Settlement, Settlement Administrator, PO Box 4536, Portland, OR 97208-4536. You can call the Settlement Administrator at 1-877-327-7567 (Toll Free) (Recorded Information Only), 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.