

EXHIBIT 3

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

IN RE ADVOCATE AURORA HEALTH
PIXEL LITIGATION

Civil Action No. 2:22-cv-1253-JPS

**DECLARATION OF
SCOTT M. FENWICK OF KROLL
SETTLEMENT ADMINISTRATION
LLC IN CONNECTION WITH FINAL
APPROVAL OF SETTLEMENT**

I, Scott M. Fenwick, declare as follows:

INTRODUCTION

1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Settlement Administrator appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision. This declaration is being filed in connection with final approval of the Settlement.

2. Kroll has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, labor and employment, consumer, and government enforcement matters. Kroll has provided notification and/or claims administration services in more than 3,000 cases.

BACKGROUND

3. Kroll was appointed as the Settlement Administrator to provide notification and claims administration services in connection with that certain Settlement Agreement. Kroll’s duties in connection with the Settlement have and will include: (a) receiving and analyzing the Settlement Class Member contact list (the “Class List”) from Defendant’s Counsel; (b) creating a Settlement Website with online claim filing capabilities; (c) establishing a toll-free telephone number; (d) establishing a post office box for the receipt of mail; (e) preparing and sending the Postcard Notice via first-class mail; (f) receiving and processing mail from the United States Postal Service (“USPS”) with forwarding addresses; (g) receiving and processing undeliverable mail, without a forwarding address, from the USPS; (h) receiving and processing Claim Forms; (i) receiving and processing Requests for Exclusion; and (j) such other tasks as counsel for the Parties or the Court request Kroll to perform.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in that certain Settlement Agreement entered into in this Litigation.

NOTICE PROGRAM

Data and Case Setup

4. On July 27, 2023, Kroll established a toll-free telephone number, (833) 933-9030, for Settlement Class Members to call and obtain additional information regarding the Settlement through an Interactive Voice Response (“IVR”) system and/or by being connected to a live operator. As of January 31, 2024, the IVR system has received 2,713 calls, and 80 callers have been connected to live operators.

5. On July 27, 2023, Kroll designated a post office box with the mailing address *Settlement Administrator - 175057*, Kroll Settlement Administration LLC, PO Box 5324, New York, NY 10150-5324, in order to receive Requests for Exclusion, Claim Forms, written notices, and correspondence from Settlement Class Members.

6. On September 11, 2023, Kroll created a dedicated Settlement Website entitled www.AdvocateAuroraSettlement.com. The Settlement Website “went live” on October 5, 2023, and allows Settlement Class Members to contact Kroll with any questions or changes of address, provide notice of important dates such as the Final Approval Hearing, Claim Deadline, Objection Deadline, and Opt-Out Date, and provides Settlement Class Members who file Claim Forms online the opportunity to select an electronic payment method, including Venmo, Zelle, Paypal, ACH, or payment by check. The Settlement Website also contains relevant case documents including the Settlement Agreement, Postcard Notice, the Long-Form Notice, the Preliminary Approval Order, and the Plaintiffs’ motion for Attorneys’ Fees, Expenses, and Service Awards.

7. On September 18, 2023, Kroll received one (1) data file from the Defendant. The file contained 2,546,044 records that included first, middle and last names, physical mailing addresses, and unique codes for Settlement Class Members. Kroll undertook several steps to reconcile the list and compile the eventual Class List for the mailing of Postcard Notices. After cleaning and de-duping the Class List, Kroll determined there were 2,540,567 unique records. Additionally, in an effort to ensure that Postcard Notices would be deliverable to Settlement Class

Members, Kroll ran the Class List through the USPS's National Change of Address ("NCOA") database and updated the Class List with address changes received from the NCOA.

The Notice Program

8. On October 20, 2023, Kroll caused 2,540,567 Postcard Notices to be mailed via first-class mail. A true and correct copy of the Postcard Notice, Long-Form Notice, and Claim Form are attached hereto as **Exhibits A, B, and C**, respectively.

NOTICE PROGRAM REACH

9. As of February 22, 2024, 21,739 Postcard Notices were returned by the USPS with a forwarding address. Of these, 21,555 Postcard Notices were automatically re-mailed to the updated addresses provided by the USPS. Kroll re-mailed the remaining 184 Postcard Notices to the updated address provided by the USPS.

10. As of February 22, 2024, 143,546 Postcard Notices were returned by the USPS as undeliverable as addressed, without a forwarding address. Kroll ran 142,488 undeliverable records through an advanced address search. The advanced address search produced 109,073 updated addresses. Kroll has re-mailed Postcard Notices to the 109,073 updated addresses obtained from the advance address search. Of the 109,073 re-mailed Postcard Notices, 11,873 have been returned as undeliverable a second time. Kroll will continue to trace and remail the remaining 11,873 Postcard Notices that were returned as undeliverable.

11. Based on the foregoing, following all Postcard Notices re-mailings, Kroll has reason to believe that Postcard Notices likely reached 2,494,221 of the 2,540,567 persons to whom the Postcard Notice was mailed, which equates to a reach rate of the direct mail notice of approximately 98.18%. This reach rate is consistent with other court-approved, best-practicable notice programs and Federal Judicial Center Guidelines, which state that a notice plan that reaches² over 70% of targeted class members is considered a high percentage and the "norm" of a notice

² FED. JUD. CTR., *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010), available at <https://www.fjc.gov/sites/default/files/2012/NotCheck.pdf>. The guide suggests that the minimum threshold for adequate notice is 70%.

campaign.³ The table below provides an overview of dissemination results for the direct notice program.

Direct Notice Program Dissemination & Reach		
Description	Volume of Class Members	Percentage of Class Members
Settlement Class Members	2,540,567	100.0%
Initial Postcard Notice Mailing		
(+) Postcard Notices Mailed (Initial Campaign)	2,540,567	100%
(-) Total Postcard Notices returned as undeliverable	(143,546)	5.65%
Supplemental Postcard Notice Mailing		
(+) Total Unique Postcard Notices Re-mailed	109,073	4.29%
(-) Total Undeliverable (Re-Mailed) Postcard Notices	(11,873)	0.47%
Direct Notice Program Reach		
(=) Likely Received Direct Notice	2,491,175	98.18%

CLAIM ACTIVITY

12. As of February 22, 2024, Kroll has received 363,304 Claim Forms submitted through the mail and 207,659 Claim Forms filed electronically through the Settlement Website. To date, Kroll has identified 529,912 unique claims to the Class List. All 529,912 claims are considered valid. The remaining 41,051 have been identified as either a duplicate claim or not on the Class List. Kroll will continue to review and validate Claim Forms and will reject duplicate claims and will send deficiency notices to those claimants who have been identified as not being on the Class List.

13. To prevent Claim Forms from being filed by individuals outside the Settlement Class and to curtail fraud, Settlement Class Members were provided a unique “Class Member ID” on their respective notices. The Class Member ID is required for Settlement Class Members to file a Claim Form online.

³ Barbara Rothstein and Thomas Willging, *Federal Judicial Center Managing Class Action Litigation: A Pocket Guide for Judges*, at 27 (3d Ed. 2010).

EXCLUSIONS AND OBJECTIONS

14. The Opt-Out Date and Objection Deadline was December 19, 2023.

15. As of February 22, 2024, Kroll has received seventy-one (71) timely Requests for Exclusion from the Settlement. A list of the Requests for Exclusion received is attached hereto as **Exhibit D**. Settlement Class Members were not instructed to submit objections to the Settlement Administrator; however, Kroll has received five (5) objections to the Settlement which Kroll provided to Class Counsel.

COSTS OF NOTICE PROGRAM

16. On September 20, 2023, Kroll received \$4,225,000 out of the \$12,225,000 total Settlement Fund. As of February 21, 2024, Kroll has billed \$1,495,278.06 for Notice and Settlement Administration Costs incurred in the administration of this matter. In light of the elevated claim rate, assuming no changes in scope of work or additional administrative work needed beyond issuance of payments, total Notice and Settlement Administration Costs will be \$2,750,000.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge and that this declaration was executed on February 22, 2024, in Inver Grove Heights, Minnesota.


SCOTT M. FENWICK

Exhibit A

Settlement Administrator - 175057
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

FIRST-CLASS MAIL
U.S. POSTAGE PAID
CITY, ST
PERMIT NO. XXXX

ELECTRONIC SERVICE REQUESTED

NOTICE OF CLASS ACTION
SETTLEMENT

You may be entitled to submit
a claim for monetary compensation
under a preliminarily approved
class action settlement.

www.AdvocateAuroraSettlement.com

<<Refnum Barcode>>

Class Member ID: <<Refnum>>

Postal Service: Please do not mark or cover

<<FirstName>> <<LastName>>

<<BusinessName>>

<<Address>>

<<Address2>>

<<City>>, <<ST>> <<Zip>>-<<zip4>>

<<Country>>

WHO IS A CLASS MEMBER?

In the litigation *In re Advocate Aurora Health Pixel Litigation*, No. 2:22-cv-1253 (E.D. Wis.), you are a Settlement Class Member if you visited Advocate Aurora Health Inc.'s ("Advocate") websites, LiveWell App, or MyChart patient portal between October 24, 2017 and October 22, 2022 (the "Settlement Class"). Advocate denies any wrongdoing and all claims asserted against it concerning its use of certain Internet tracking technologies (the "Pixels").

WHAT ARE THE SETTLEMENT BENEFITS AND TERMS?

Settlement Class Members who file a valid Claim Form may receive a *pro rata* cash payment from the Net Settlement Fund up to \$50. The Net Settlement Fund is what remains of the \$12,225,000 Settlement Fund following the payment of the Notice and Settlement Administration Costs, Class Representative Service Awards, and Attorneys' Fees and Expenses Award. More information about how to file a Claim is available on the Settlement Website, www.AdvocateAuroraSettlement.com.

WHAT ARE YOUR RIGHTS AND OPTIONS?

Submit a Claim Form. To qualify for a cash payment, you must timely mail the Claim Form that is attached to this Postcard Notice or timely complete and submit a Claim Form through the Settlement Website. Your Claim Form must be postmarked or submitted online no later than January 18, 2024.

Opt-Out. You may exclude yourself from the Settlement and retain your ability to sue Advocate on your own by mailing a written Request For Exclusion to the Settlement Administrator that is postmarked no later than December 19, 2023. If you do not exclude yourself, you will be bound by the Settlement and give up your right to sue regarding the Released Claims.

Object. If you do not exclude yourself, you have the right to object to the Settlement. Written objections must provide the reasons for the objection and be signed and postmarked no later than December 19, 2023. Please visit

www.AdvocateAuroraSettlement.com for more details.

Do Nothing. If you do nothing, you will not receive a Settlement payment and will lose the right to sue regarding the Released Claims. You will be bound by the Court's decision because this is a conditionally certified class action.

Attend the Final Approval Hearing. The Court will hold a Final Approval Hearing on March 8, 2024, at 8:30 a.m. CT, in the U.S. District Courthouse at 517 East Wisconsin Ave., Milwaukee, WI 53202, to determine if the Settlement is fair, reasonable, and adequate. All persons who timely object to the Settlement may appear at the Final Approval Hearing.

Who are the attorneys for the Plaintiffs and the Settlement Class? The Court appointed Gary M. Klinger, Alexandra Honeycutt, Terence R. Coates and Dylan J. Gould as Class Counsel to represent the Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have any obligation to pay attorneys' fees or expenses?

No. The attorneys' fees and expenses will be paid exclusively from the Settlement Fund as awarded and approved by the Court. The requested attorneys' fees will be up to 35% of the Settlement Fund. The motion for attorneys' fees and expenses will be posted on the Settlement Website after it is filed with the Court.

What is the amount of the Class Representatives' Service Awards?

The named Plaintiffs, also called the Class Representatives, will seek Service Awards in the amount of \$3,500 each for their efforts in this case.

Who is the Judge overseeing this settlement? The Honorable J.P. Stadmueller, United States District Judge, Eastern District of Wisconsin, is presiding over this litigation and the Settlement process.

Where may I locate a copy of the Settlement Agreement, learn

more about the case, or learn more about submitting a claim? www.AdvocateAuroraSettlement.com

This Notice is a summary of the proposed Settlement.

Postage
Required

Settlement Administrator - 175057
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

<<Barcode>>

Class Member ID: <<Refnum>>

CLAIM FORM

Claims must be postmarked or submitted via
www.AdvocateAuroraSettlement.com no later than January 18, 2024.

Class Member ID: <<refnum>>

<<firstname>> <<mi>> <<lastname>>

<<address1>> <<address2>>

<<City>>, <<State>> <<Zip>>

If different than the preprinted data on the left, please print your correct information:			
_____	MI	_____	_____
First Name		Last Name	

Address			
_____	_____	_____	_____
City	State	Zip Code	

Monetary Compensation

1. **Pro Rata Cash Payment:** Would you like to receive a *pro rata* cash payment under the Settlement? (circle one) **Yes** **No**

If you are a Settlement Class Member, you may receive up to a \$50 cash payment, which may be decreased *pro rata* based on the funds remaining in the Net Settlement Fund after all claims are submitted.

By signing my name below, I swear and affirm under penalty of perjury that I resided in the United States and visited Advocate’s websites, used its LiveWell app, or logged into a MyChart patient portal account through Advocate’s website at least once between October 24, 2017 and October 22, 2022.

Case 2:22-cv-01253-JPS Filed 02/23/24 Page 12 of 28 Document 47-3

Signature: _____ Dated: _____ / _____ / _____

Exhibit B

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
FOR PERSONS WHOSE PERSONAL INFORMATION WAS ALLEGEDLY DISCLOSED TO THIRD
PARTIES AS A RESULT OF ADVOCATE AURORA HEALTH, INC.'S ("ADVOCATE") USE OF
TRACKING PIXELS ON ITS WEBSITES BETWEEN OCTOBER 24, 2017, AND OCTOBER 22, 2022.**

All persons whose Personal Information may have been shared in connection with the Pixel Disclosure.

A United States District Court authorized this 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
YOUR PERSONAL INFORMATION MAY HAVE BEEN SHARED WITH THIRD PARTIES
IF YOU VISITED ADVOCATE'S WEBSITES, LIVEWELL APP, OR MYCHART PATIENT PORTAL
BETWEEN OCTOBER 24, 2017, AND OCTOBER 22, 2022.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM BY THE CLAIM DEADLINE OF JANUARY 18, 2024	If you submit a Claim Form by January 18, 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 monetary compensation under this Settlement. IF YOU DO NOTHING , you will not receive Settlement benefits, but you will be bound by the Settlement.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY THE OPT-OUT DATE OF DECEMBER 19, 2023	You will receive no benefits, but you will retain your legal claims against Advocate.
OBJECT BY THE OBJECTION DEADLINE OF DECEMBER 19, 2023	File a written Objection to the Settlement with the Court, explaining why you do not like the Settlement, and serve copies of your Objection on all Class Counsel and Defendant's Counsel, at the addresses listed in Response #16 below. You must remain in the Settlement Class to Object to the Settlement.
ATTEND THE FINAL APPROVAL HEARING ON MARCH 8, 2024	Ask to speak in Court about the fairness of the Settlement. You do not need to attend the hearing to receive monetary compensation.

1. What is this Notice?

This is a Court-authorized Long-Form Notice of a proposed Settlement (the “Settlement”) of a class action, *In re Advocate Aurora Health Pixel Litigation*, Case No. 2:22-cv-1253 (the “Litigation”), pending in the U.S. District Court for the Eastern District of Wisconsin (the “Court”). The Litigation arose after a notification by Advocate Aurora Health Inc. (“Advocate” or the “Defendant”) on October 22, 2022 that it had used internet tracking technologies supplied by third parties, including pieces of code known as “pixels” (the “Tracking Pixels”), and, when using some sites or applications, personal or health information would be disclosed in particular circumstances to specific vendors because of the Tracking Pixels. The Court has granted Preliminary Approval of the Settlement Agreement and has conditionally certified the Settlement Class (defined below in Response #6) 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 members of the Settlement Class. Please read the instructions and explanations below carefully so that you can better understand your legal rights.

2. Why did I get this Notice?

You may have received a Notice because you were identified as a person whose personal or health information may have been shared with third parties in connection with your visiting Advocate’s websites, LiveWell app, or MyChart portal between October 24, 2017, and October 22, 2022.

3. What is this lawsuit about?

The Litigation arises out of Advocate’s implementation and use of the Tracking Pixel on Advocate’s websites, LiveWell app, or MyChart portal, defined below as the “Pixel Disclosure,” during which Plaintiffs allege their web usage data, containing Personal Information, was shared with third parties, allegedly resulting in the invasion of Plaintiffs’ and Settlement Class Members’ privacy.

“Pixel Disclosure” means the alleged disclosure of Plaintiffs’ and Settlement Class Members’ personal or health information to Facebook, Google, or other third parties as a result of any use of Tracking Pixels on Defendant’s websites, LiveWell app, and MyChart portal between October 24, 2017, and October 22, 2022.

4. Why is this a class action?

A class action is a lawsuit in which an individual called a “Class Representative” 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 Pixel Disclosure. If finally approved by the Court, the Settlement Agreement requires Advocate 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 Advocate and does not imply that there has been, or would be, any finding that Advocate violated the law.

The Court 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 become 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 for or opposition to final approval of the Settlement Agreement. If the Court does not finally approve 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 resided in the United States and visited Advocate’s websites, LiveWell App, or MyChart patient portal between October 24, 2017, and October 22, 2022 (the “Settlement Class”). Excluded from the Settlement Class are Advocate and its affiliates, parents, subsidiaries, officers, and directors, as well as the judges presiding over this matter and the clerks of said judges. This exclusion does not apply to those employees of Advocate and certain related entities who received Defendant’s October 22, 2022, notification regarding its usage of Tracking Pixels.

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* cash payment from the Net Settlement Fund. The Net Settlement Fund is what remains of the \$12,225,000 Settlement Fund following the payment of the Notice and Settlement Administration Costs, Class Representative Service Awards, and Attorneys’ Fees and Expenses Award.

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

8. When will I receive the benefits?

If you timely submit a valid Claim Form for monetary recovery, you will receive payment in the amount approved by the Settlement Administrator (Kroll Settlement Administration LLC) after the Settlement Administrator processes your Claim Form. You will receive such payment after 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 compensation, you must timely submit the Claim Form on the Settlement Website at www.AdvocateAuroraSettlement.com, or by mail to Settlement Administrator - 175057, c/o Kroll Settlement Administration LLC, PO Box 5324, New York, NY 10150-5324.

You must submit any claims by the Claim Deadline of January 18, 2024. 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, all the Court's orders will apply to you and will bind you. You also give Defendant a "release," which means you cannot sue or be part of any other lawsuit or other legal action against Defendant about or arising from the claims or issues in this Litigation with respect to the alleged sharing of your personal or health information.

The precise terms of the release are in the Settlement Agreement, which is available on the Documents section of 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 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 Class Representatives receive?

The named Plaintiffs will seek a payment of \$3,500 each for their services to the Settlement Class as Class Representatives. 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 preserve 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 send a Request for Exclusion by mail stating that you want to be excluded from *In re Advocate Aurora Health Pixel Litigation*, Case No. 2:22-cv-1253 (E.D. Wis.), to the Settlement Administrator. Such Request for Exclusion shall include: (1) your full name and address; (2) the case name and docket number; (3) a written statement that you wish to be excluded from the Settlement; and (4) your signature. You must mail your Request for Exclusion, postmarked **no later than the Opt-Out Date of December 19, 2023**, to:

Settlement Administrator - 175057
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 Request for Exclusion, 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 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. If you file an Objection (see Response #16), you may still receive benefits if you timely file a claim.

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:

Gary M. Klinger and Alexandra Honeycutt
Milberg Coleman Bryson Phillips Grossman, PLLC
227 W. Monroe Street, Suite 2100
Chicago, IL 60606
Phone: (866) 252-0878

Terence R. Coates and Dylan J. Gould
Markovits, Stock & DeMarco, LLC
119 E. Court Street, Suite 530
Cincinnati, OH 45202
Phone: (513) 651-3700

These attorneys will be paid 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 for the Settlement Class be paid?

Class Counsel will request to be paid reasonable attorneys' fees up to 35% of the Settlement Fund, plus their expenses incurred in the Litigation, subject to Court approval. The motion for attorneys' fees and expenses 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. To Object to the Settlement, you must submit 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 the Settlement. Your Objection should include: (1) the objector's full name, telephone number, email address, and address; (2) proof of being a member of the Settlement Class; (3) the case name and docket number, *In re Advocate Aurora Health Pixel Litigation*, Case No. 2:22-cv-1253 (E.D. Wis.); (4) whether the objection applies only to the Settlement Class Member or to the entire Settlement Class; (5) all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials; (6) the identification of any other objections he/she has filed, or has had filed on his/her behalf, in any other class action cases in the last three years; (7) whether the objector intends to appear at the Final Approval Hearing; and (8) the objector's signature.

If represented by counsel, the objecting Settlement Class Member must also provide his/her counsel's name, address, phone number, email address, the state bar(s) to which counsel is admitted, as well as associated state bar numbers. If the objecting Settlement Class Member intends to appear at the Final Approval Hearing, either with or without counsel, he/she must say so in the written objection, and must also identify any witnesses he/she may call to testify at the Final Approval Hearing and all exhibits he/she intends to introduce into evidence at the Final Approval Hearing, which must also be attached to, or included with, the written objection.

If you file an Objection, you may still receive benefits so long as you timely file a claim. To be timely, written notice of an Objection in the appropriate form must be filed with the Court no later than the Objection Deadline, **December 19, 2023**, and served on Class Counsel and Defendant's Counsel (Ropes & Gray LLP and Quarles & Brady LLP), as noted below:

<p>United States District Court for the Eastern District of Wisconsin 517 East Wisconsin Avenue Milwaukee, WI 53202</p>	<p>Ropes & Gray LLP c/o Edward R. McNicholas and Frances Faircloth 2099 Pennsylvania Avenue NW Washington, DC 20006</p>
<p>Milberg Coleman Bryson Phillips Grossman, PLLC c/o Gary M. Klinger and Alexandra Honeycutt 227 W. Monroe Street, Suite 2100 Chicago, IL 60606</p>	<p>Quarles & Brady LLP c/o Daniel E. Conley, Kristin C. Foster, and Nathan Oesch 411 East Wisconsin Avenue, Suite 2400 Milwaukee, WI 53202</p>
<p>Markovits, Stock & DeMarco, LLC c/o Terence R. Coates and Dylan J. Gould 119 E. Court Street, Suite 530 Cincinnati, OH 45202</p>	

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 preliminarily approved the Settlement Agreement. The Court will hold the Final Approval Hearing on **March 8, 2024, at 8:30 A.M. CT** in the courtroom of the Honorable J.P. Stadtmueller, Courtroom 425, which is located in the courthouse at 517 E. Wisconsin Ave., Milwaukee, Wisconsin 53202. 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 the Class Representatives. At that hearing, the Court may 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 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.AdvocateAuroraSettlement.com

If you have any questions, you can contact the Settlement Administrator or Class Counsel at the phone numbers set forth above. Do not address any questions about the Settlement or the Litigation to the Clerk of Court, the Judge, or Defendant’s Counsel. 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.

Exhibit C



750570000000

<p>YOUR CLAIM FORM MUST BE SUBMITTED ON OR BEFORE JANUARY 18, 2024</p>	<p>Settlement Administrator - 175057 c/o Kroll Settlement Administration LLC PO Box 5324 New York, NY 10150-5324</p>	<p>FOR OFFICE USE ONLY</p>
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In re Advocate Aurora Health Pixel Litigation

U.S. District Court for the Eastern District of Wisconsin (Case No. 2:22-cv-1253)

CLAIM FORM

**SAVE TIME BY SUBMITTING YOUR CLAIM ONLINE AT
WWW.ADVOCATEAURORASETTLEMENT.COM**

GENERAL CLAIM FORM INFORMATION

You may complete and submit a claim online or by mail if you resided in the United States and visited Advocate Aurora Health Inc.'s ("Advocate") websites, LiveWell app, or MyChart patient portal between October 24, 2017, and October 22, 2022 (the "Settlement Class").

The Postcard Notice mailed to members of the Settlement Class summarizes your legal rights and options. Please visit the official Settlement Website, www.AdvocateAuroraSettlement.com, or call (833) 933-9030 for more information.

If you wish to submit a claim for a Settlement cash payment, please provide the information requested below. You must submit your claim online by the Claim Deadline of **January 18, 2024**, or complete and mail this Claim Form to the address at the top of this form, postmarked by **January 18, 2024**.

TO SUBMIT A CLAIM FOR PAYMENT:

1. Complete all sections of this Claim Form.
2. Sign the Claim Form.
3. Submit the completed Claim Form to the Settlement Administrator so that it is postmarked by **January 18, 2024**.

This Claim Form should only be used if a claim is being mailed and is not being filed online. Note that postage to send the Claim Form by mail is not pre-paid.

Payment will be mailed in the form of a check to the address you provide below. If you would like to receive a payment electronically (e.g., Venmo, PayPal, or ACH) you must submit a Claim Form online at www.AdvocateAuroraSettlement.com.



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Page 1 of 3



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1. SETTLEMENT CLASS MEMBER INFORMATION

*First Name MI *Last Name

*Mailing Address: Street Address/P.O. Box (include Apartment/Suite/Floor Number)

*City *State *Zip Code Zip4 (Optional)

*Current Email Address @

(____ ____ ____) ____ ____ ____ - ____ ____ ____ ____
Current Phone Number (Optional)

2. PAYMENT ELIGIBILITY INFORMATION AND ATTESTATION

Please review the Postcard Notice and Frequently Asked Questions located on the Settlement Website, www.AdvocateAuroraSettlement.com, for more information about who is eligible for a cash payment under the Settlement. Please provide as much information as you can to help us determine if you are entitled to a Settlement cash payment.

Settlement Class Members who file a valid Claim Form will be eligible to receive a pro rata cash payment from the Net Settlement Fund. Settlement Class Members will receive, at most, one (1) payment.

I attest that I resided in the United States and visited Advocate’s websites, used its LiveWell app, or logged into a patient portal account through Advocate’s website at least once between October 24, 2017, and October 22, 2022.



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3. SIGN AND DATE YOUR CLAIM FORM

I declare under penalty of perjury, under the laws of the United States and the state where this Claim Form is signed, that the information I have supplied in this Claim Form is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that all information provided on this Claim Form is subject to verification and that I may be asked to provide supplemental information before my claim will be considered complete and valid.

Signature

____/____/_____
Date (mm/dd/yyyy)

Printed Name

Please keep a copy of your completed Claim Form for your records.

Mail your completed Claim Form to the Settlement Administrator:

Settlement Administrator - 175057
c/o Kroll Settlement Administration LLC
PO Box 5324
New York, NY 10150-5324

or submit your Claim online at
www.AdvocateAuroraSettlement.com

It is your responsibility to notify the Settlement Administrator of any changes to your contact information after you submit your claim. You can update your contact information on the Contact page at **www.AdvocateAuroraSettlement.com**.



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Page 3 of 3

Exhibit D

Exclusion List

Count	Record Identification Number
1	75057FG3G2VGT
2	75057FBVM3XKB
3	75057CVMT6ZDB
4	75057DV4JDS3B
5	75057DFZT4RFR
6	75057DG6742D5
7	75057DQ141XBT
8	75057CW5T7M87
9	75057DX7Y8SBN
10	75057DQ21CSDD
11	75057F83H1M68
12	75057DSYNNPVG
13	75057FTDSVQBR
14	75057F3GCKJ7J
15	75057FCPJ6MTN
16	75057CCS9XRVK
17	75057D4G41DT2
18	7505771Q0Q2HC
19	75057CB9DQ351
20	75057F7RVGXB0
21	75057DNKWXCB2
22	75057D03THFVX
23	75057CQ78GSNH
24	75057CK8B1DQR
25	75057DVWNMBYG
26	75057CY7NR4SM
27	75057CM0T4V2W
28	75057CJYGZ9C5
29	75057CBMHHCGX
30	75057CZHG63GP
31	75057D23HJJQ7
32	75057DF84T36Y
33	75057D64VTW81
34	75057CVC8R388
35	75057F8H9YDFW
36	75057DTNHYDX4
37	75057CXV9GVGF
38	75057CXGQQ7VX
39	75057FHH832F8
40	750577T8GVPBJ
41	75057D2884GRF
42	75057DNVYMM39
43	75057D6B36R6Y
44	75057FRJXHVVZ
45	75057CVMBWY4M

Exclusion List

Count	Record Identification Number
46	75057FRWQT8FH
47	75057CVDW6W08
48	750571Q8C1BFP
49	75057FCTRB9WP
50	750575CSPQBZ0
51	75057FSGR8SF1
52	750572GJPPMJ3
53	75057FKBKWZSP
54	75057FMVZCNWD
55	75057D0GFZHZC
56	75057DN44CJBN
57	75057DY969841
58	75057C107ND54
59	75057FMVT61B2
60	75057D4KB9W0S
61	75057CD5HS6V4
62	75057FBJHWXWP
63	75057DF27MJ55
64	75057DXBGS63S
65	75057DBYRMWF7
66	750575PGKCC3N
67	75057FHZ6ZYCG
68	75057CYGY5CMV
69	75057D0XR6Z1K
70	75057CDKGM8J7
71	7505729Z8QY0T