



Superior Court of California for the County of Los Angeles

Merle v. USC Arcadia Hospital

Case No. 23STCV01900

Class Action Notice

Authorized by the Superior Court of California for the County of Los Angeles

Did you sign up for email notifications on the USC Arcadia Hospital website between February 1, 2022 and January 31, 2023?

There is a \$200,000 Settlement of a lawsuit.

You may be entitled to compensation.

To be part of this Settlement, you should:

Read this notice.

Respond by December 7, 2026.

Important things to know:

- If you take no action, you will remain eligible for one year of CyEx Privacy Shield Pro, receive no cash payment, and be bound by the Settlement and its release.
- You can learn more at: **www.USCArcadiaHospitalSettlement.com**.
- Para leer esta noticia en español, visita: **www.USCArcadiaHospitalSettlement.com/documents**

Table of Contents

About This Notice	3
Why did I get this notice?	3
What do I do next?	3
What are the most important dates?	4
Learning About the Lawsuit	4
What is this lawsuit about?	4
Why is there a Settlement in this lawsuit?	4
What happens next in this lawsuit?	5
Learning About the Settlement.....	5
What does the Settlement provide?	5
How do I know if I am part of this Settlement?	6
How much will my cash payment be?	7
Deciding What to Do.....	7
How do I weigh my options?	8
What is the best path for me?	9
Submitting a Claim	9
How do I get a cash payment if I am a Settlement Class Member?.....	9
Do I have a lawyer in this lawsuit?	10
Do I have to pay the lawyers in this lawsuit?	10
Opting Out.....	11
What if I don't want to be part of this Settlement?	11
How do I submit a Request for Exclusion?	11
Objecting	12
What if I disagree with the Settlement?.....	12
Doing Nothing	12
What are the consequences of doing nothing?	12
Key Resources	12
How do I get more information?	13

About This Notice

Why did I get this notice?

This notice is to tell you about the Settlement of a class action lawsuit, *Merle v. USC Arcadia Hospital* brought on behalf of people who completed forms on the USC Arcadia Hospital website to sign up for email or event updates. **You received this notice because you may be a member of the group of people affected, called the “class.”** This notice gives you a summary of the terms of the proposed Settlement Agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the Settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Submit a Claim Form	You must submit a timely and valid Claim Form online or by mail to receive a cash payment. You do not need to submit a Claim Form to receive one year of CyEx Privacy Shield Pro, although activation or enrollment may be required to use the service. You will be bound by the Settlement unless you submit a timely and valid Request for Exclusion.
Do Nothing	Remain eligible for one year of CyEx Privacy Shield Pro, receive no cash payment, and give up the claims released by the settlement.
Opt Out	Receive neither CyEx Privacy Shield Pro nor a cash payment. You will not be bound by the settlement or its release and may bring your own lawsuit against USC Arcadia Hospital about the same issues.
Object	Tell the Court why you don't like the settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to submit a claim form, object in writing, or opt out:

December 7, 2026

Final Fairness Hearing: **Monday, December 14, 2026**

Learning About the Lawsuit

What is this lawsuit about?

A class action lawsuit was filed against USC Arcadia Hospital on behalf of people who used the Hospital's website. The lawsuit claims that USC Arcadia Hospital shared website users' private information with Meta and other third parties by installing the Meta Pixel and other tracking technologies on its website and, as a result, the website users' privacy has been violated.

USC Arcadia Hospital denies that it did anything wrong including violating HIPAA or other privacy statutes.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:
www.USCArcadiaHospitalSettlement.com

Why is there a Settlement in this lawsuit?

The parties agreed to settle, which means they have reached an Agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The Settlement is on behalf of the website user who brought the case and all members of the Settlement Class, which includes people who completed forms on the USC Arcadia Hospital website to sign up for email or event updates from February 1, 2022, to January 31, 2023. The Court has not decided this case in favor of either side.

What is a Class Action Settlement?

A Class Action Settlement is an Agreement between the parties to resolve a lawsuit without a trial or a decision about which side is right. A Settlement may provide benefits to class members in exchange for the release of specified claims.

What happens next in this lawsuit?

The Court will hold a Final Fairness Hearing to decide whether to approve the Settlement. The hearing will be held at:

Where: Department 001 of the Spring Street Courthouse, Los Angeles County Superior Court.

When: 10:30 A.M. on Monday, December 14, 2026.

The Court has directed the parties to send you this notice about the proposed Settlement. Because the Settlement of a class action decides the rights of all members of the proposed class, the Court must review and approve the Settlement before it can take effect. Settlement benefits will be provided only if the Court grants final approval and the Settlement becomes effective. If the Court approves the settlement, the judgment, whether favorable or not, will bind all class members who do not opt out.

You are not required to attend the Final Fairness Hearing, but you may attend at your own expense. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.USCArcadiaHospitalSettlement.com.

Learning About the Settlement

What does the Settlement provide?

BENEFITS

The Settlement provides two benefits that are available to all Class Members. You may choose to receive one or both of these benefits.

- **CyEx Privacy Shield Pro.** CyEx Privacy Shield Pro is a service that keeps your personal information safe by checking for it on the dark web. If it finds your private details there, it will alert you immediately. If fraud does occur, a dedicated case manager will help you fix the problem. All Settlement Class Members will receive an activation code for one year of this service.

• **Cash Payment.** All Settlement Class Members may claim a pro rata share of the Settlement fund. USC Arcadia Hospital has agreed to pay \$200,000 into a Settlement fund. This money will be distributed to Settlement Class Members in equal shares and will also be used to pay for any lawyers' fees and costs approved by the Court, and the cost of administering this Settlement, which includes providing CyEx Privacy Shield activation codes for all Settlement Class Members.

If there is money left over after the claims process is completed, it will be donated to The Los Angeles Trust for Children's Health.

RELEASE

Settlement Class Members who do not submit a timely and valid Request for Exclusion will "release" their claims as part of the Settlement, which means they cannot sue USC Arcadia Hospital for the same issues in this lawsuit.

By participating in the Settlement, members of the Settlement class will release any and all claims or causes of action arising out of the facts giving rise to the Action that were alleged or reasonably could have been alleged based on the facts in the Complaint, including, but not limited to, all claims and causes of action under California Civil Code § 56, Cal. Pen. Code §§ 631, 637, and all similar statutes in effect in any states in the United States, including, but not limited to, any and all claims for damages, injunctive relief, disgorgement, declaratory relief, equitable relief, attorneys' fees and expenses, pre-judgment interest, credit monitoring services, the creation of a fund for future damages, statutory damages, punitive damages, special damages, exemplary damages, restitution, the appointment of a receiver, claims under California law, and any other state or federal law for statutory damages arising from the Action described in Section 2.2 of this Agreement or the disclosure of personal, confidential medical, or genetic information. The definition of "Released Claims" shall be construed as broadly as possible under California law to effect complete finality over this Action. Released Claims shall not include the right of any Settlement Class Member or any of the Released Parties to enforce the terms of the Settlement contained in this Settlement Agreement and shall not include the claims of Settlement Class Members who have timely opted out of the Settlement Class. For avoidance of doubt, Released Claims do not include medical malpractice or other bodily injury claims, or claims relating to the enforcement of the Settlement.

How do I know if I am part of this Settlement?

If you completed a form on the USC Arcadia Hospital website to sign up for email notifications or event updates from February 1, 2022, to January 31, 2023, you may be a Settlement Class Member. Settlement Class Members who do not exclude themselves are eligible for one year of CyEx Privacy Shield Pro, and those who submit timely and valid Claim Forms are also eligible for a cash payment.

Under the Settlement Agreement, the Settlement class defined as “any person who completed forms on Defendant’s website to sign up for email/events updates from Defendant from February 1, 2022, to January 31, 2023 (“Class Period”).” Excluded from the Settlement Class are: (1) the Judge(s) presiding over the Action and members of their families; (2) Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which Defendant or its parents have a controlling interest, and its current or former officers and directors; (3) natural persons who properly execute and submit a Request for Exclusion prior to the Response Deadline; and (4) the successors or assigns of any such excluded natural person.

How much will my cash payment be?

Settlement Class Members who submit timely and valid Claim Forms will receive equal pro rata shares of the Net Settlement Fund—the amount remaining after payment of (1) any Fee and Expense Award approved by the Court (see “Do I have to pay the lawyers in this lawsuit?” below), (2) Notice and Administration Expenses, including the cost of CyEx Privacy Shield Pro, and (3) any Service Award approved by the Court.

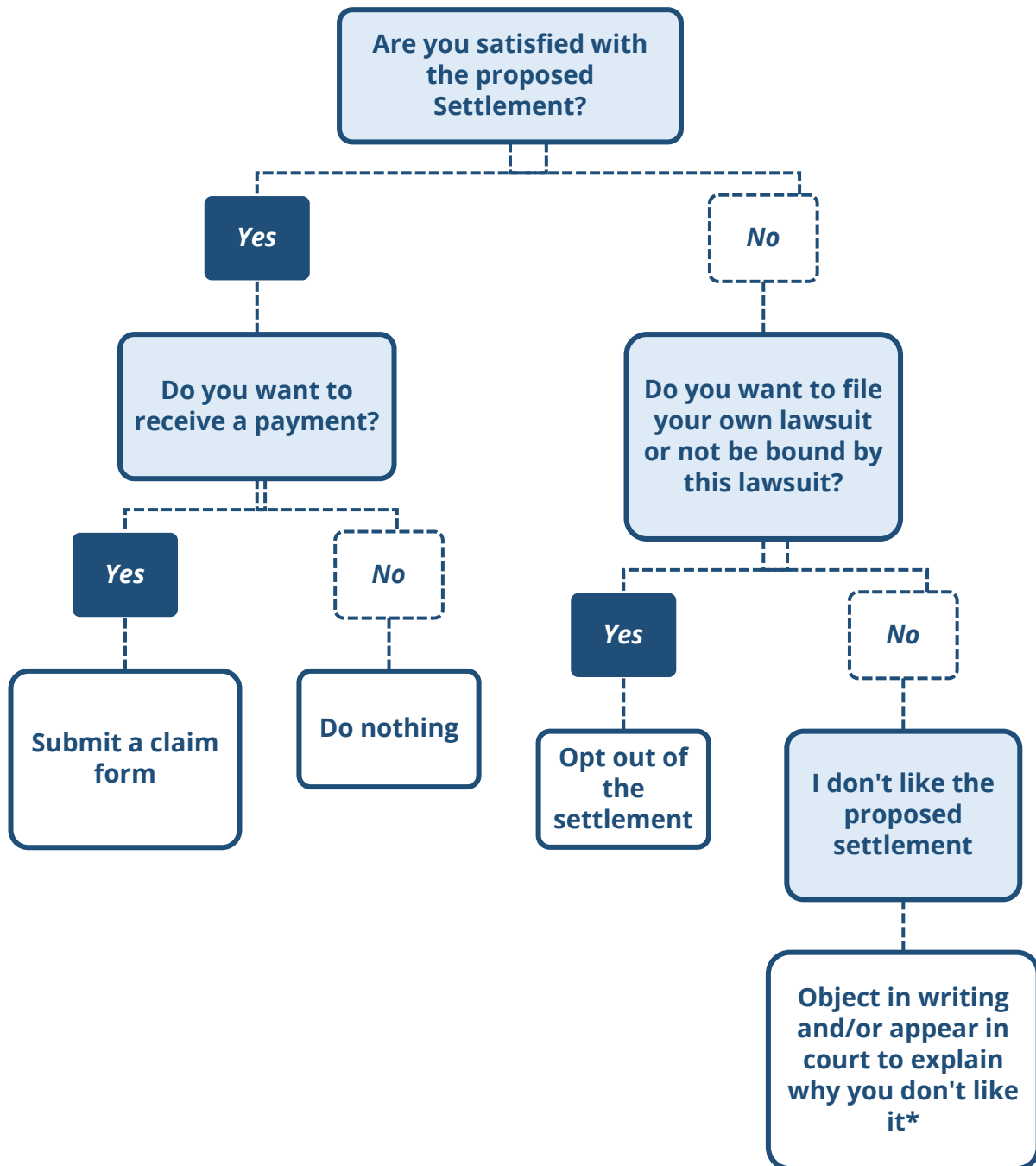
Deciding What to Do

How do I weigh my options?

You have four options. You can stay in the settlement and submit a claim, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. This chart shows the effects of each option:

	Submit a Claim Form	Opt out	Object	Do Nothing
Can I receive Settlement money if I . . .	YES	NO	YES, if you also submit a timely and valid Claim Form	NO
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO
Will the class lawyers represent me if I . . .	YES	NO	NO	YES

What is the best path for me?



**You may object to the Settlement and submit a timely and valid Claim Form to receive a cash payment.*

Submitting a Claim Form

How do I get a cash payment if I am a Settlement Class Member?

To receive a cash payment, you must submit a completed Claim Form by December 7, 2026. You may submit a Claim Form online at www.USCArcadiaHospitalSettlement.com or download a Claim Form from www.USCArcadiaHospitalSettlement.com and mail to the Settlement Administrator at

Simpluris, Inc.
P.O. Box 25226
Santa Ana, CA 92799

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this Settlement, the Court has appointed the following Settlement Class Counsel:

Nicholas A. Coulson and Ellyn Gendler of Coulson P.C., and Mike M. Arias, Arnold C. Wang, and M. Anthony Jenkins of Arias Sanguinetti Wang & Team LLP. These are the lawyers who negotiated this Settlement on your behalf.

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

Do I have to pay the lawyers in this lawsuit?

Settlement Class Counsel's fees and costs will be paid from the Settlement Fund. **You will not have to pay them directly.**

To date, Settlement Class Counsel have not been paid any money for their work or the expenses that they have incurred in the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, Settlement Class Counsel will request, as part of the final approval of this Settlement, that the Court approve a payment of \$61,335.92 total in attorneys' fees plus the reimbursement of out-of-pocket

expenses of \$15,992.25).

The Fee and Expense Award will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the requested Fee and Expense Award even if you think the other Settlement terms are fair.

Class Counsel will also ask the Court to approve a \$1,500 Service Award to the named plaintiff for the time and effort he contributed to the case. If approved, the Service Award will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this Settlement?

You can opt out. If you do, you will receive neither CyEx Privacy Shield Pro nor a cash payment and may not object to the Settlement. You will not be bound by the Settlement or its release and may be able to bring your own lawsuit. The Court will exclude you from the Settlement Class if you submit a timely and valid Request for Exclusion by December 7, 2026.

How do I submit a Request for Exclusion?

To opt out of the Settlement, you must mail a letter to the Settlement Administrator that:

- (1) is postmarked by December 7, 2026;
- (2) includes the case name and number (*Merle v. USC Arcadia Hospital*, No. 23STCV01900 (Los Angeles County Superior Court));
- (3) includes your full name, address, and telephone number;
- (4) includes a clear statement requesting exclusion from the proposed Settlement Class in *Merle v. USC Arcadia Hospital*, No. 23STCV01900 (Los Angeles County Superior Court);
- (5) includes your signature.

Mail the letter to:

Simpluris, Inc.
P.O. Box 25226
Santa Ana, CA 92799

Objecting

What if I disagree with the Settlement?

If you disagree with any part of the Settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must either present your objection in person at the Final Fairness Hearing or send a letter to the Settlement Administrator that:

- (1) is postmarked by December 7, 2026;
- (2) includes the case name and number (*Merle v. USC Arcadia Hospital*, No. 23STCV01900 (Los Angeles County Superior Court));
- (3) includes your full name, address, and telephone number;
- (4) states whether your objection applies to only yourself, a subset of the Settlement Class, or the entire Settlement Class
- (5) states the reasons for your objection;
- (6) includes all documents you want the Court to consider;
- (7) states whether you or your lawyer intends to appear at the Final Fairness Hearing and includes your lawyer's name, if applicable;
- (8) includes your signature.

Mail the letter to:

Simpluris, Inc.
P.O. Box 25226
Santa Ana, CA 92799

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will remain eligible for one year of CyEx Privacy Shield Pro, although activation or enrollment may be required to use the service.

You will not receive a cash payment because you did not submit a Claim Form. You will still be bound by the Settlement and its release provisions, which means you will not be able to start, continue, or participate in another lawsuit against USC Arcadia Hospital based on the Released Claims. A full description of the Released Claims and Released Parties is available in the Settlement Agreement at www.USCArcadiaHospitalSettlement.com.

Key Resources

How do I get more information?

This notice is a summary of the proposed Settlement. The complete Settlement with all its terms can be found here. To get a copy of the Settlement Agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at www.USCArcadiaHospitalSettlement.com

Resource	Contact Information
Case website	www.USCArcadiaHospitalSettlement.com
Settlement Administrator	Simpluris, Inc. P.O. Box 25226 Santa Ana, CA 92799 (844) 496-0567
Settlement Class Counsel	Coulson P.C. 300 River Place Drive, Suite 1700 Detroit, MI 48207 (313) 644-2685
Court (DO NOT CONTACT)	Superior Court of California, County of Los Angeles Spring Street Courthouse 312 North Spring Street Los Angeles, CA 90012