

If you are a Washington resident who is or was a patient of Virginia Mason Medical Center or Virginia Mason Health System or any of their affiliates and have used www.viriniamason.org or the MyVirginiaMason patient portal, please read this notice—it may affect your rights.

What is this case about? The lawsuit is called *Doe v. Virginia Mason*, No. 19-2-26674-1-SEA, and is before a judge of the King County Superior Court in Washington State. The lawsuit claims that Virginia Mason placed tracking pixels on its website that transmit patients' personally identifiable information, their status as patients of Virginia Mason, and their communications with Virginia Mason to Facebook, Google, Signal, and The Trade Desk. The alleged communications included medical-related information and providers patients view on Virginia Mason's website, and when patients enter or exit the patient portal and request or set appointments. The lawsuit seeks monetary damages for identity theft (RCW 9.35.020); breach of duty of confidentiality; invasion of privacy; violations of the Washington Consumer Protection Act (RCW 19.86.010, *et seq.*) and Washington Healthcare Information Act (RCW 70.2.005, *et seq.*); negligence; fraudulent concealment; and unjust enrichment. Defendants deny Plaintiffs' allegations. The Court decided that the Class includes all Washington residents who are, or were, patients of Virginia Mason Medical Center or Virginia Mason Health System or any of their affiliates and who exchanged communications at www.viriniamason.org or the MyVirginiaMason patient portal. This Notice summarizes your rights and options before trial. You have to decide whether to stay in the Class and be bound by any result, or ask to be excluded and keep your right to sue Virginia Mason. **There is no money available now and no guarantee that there ever will be.** More information is in a detailed notice available at the case website www.VirginiaMasonPrivacyClassAction.com.

YOUR LEGAL RIGHTS AND OPTIONS

Do Nothing. Stay in this lawsuit. Await the outcome. Give up certain rights.

If you do nothing, you keep the possibility of getting money or benefits that may come from a trial or settlement. If you stay in the case you will be bound by any Court decisions and any trial in the case. There is no money available now and no guarantee that there ever will be. If you stay in the case, you give up any rights to sue Virginia Mason separately about the same legal claims as the claims in this lawsuit.

The Court decided that Terrell Marshall Law Group PLLC, Simmons Hanly Conroy, LLC, the Gorny Law Firm LC, Kiesel Law LLP, and the Simon Law Firm, PC are qualified to represent you and all Class Members. If you do nothing and stay in the case, those lawyers will represent the interests of you and the Class. If you have questions about whether you need your own lawyer, visit the case website at www.VirginiaMasonPrivacyClassAction.com or call 1-844-609-1124.

Opt Out. Get out of this lawsuit. Get no benefits from it. Keep rights.

If you ask to be excluded and money or benefits are later awarded to the Class, you won't share in those. But, you keep any rights to sue Virginia Mason separately about the same legal claims

as the claims in this lawsuit. You may exclude yourself from the lawsuit and keep your right to sue Virginia Mason on your own by sending a letter to the Notice Administrator at P.O. Box 3637 Baton Rouge, Louisiana 70821, stating that you wish to be excluded from the lawsuit. You must exclude yourself from the lawsuit by October 30, 2023. Your exclusion request must include your name, address and signature.

How can you get more information: If you have questions or want a detailed notice or other documents about this lawsuit and your rights, visit the case website, www.VirginiaMasonPrivacyClassAction.com, write to the Notice Administrator at P.O. Box 3637 Baton Rouge, Louisiana 70821, or call toll-free 1-844-609-1124.

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