

If you are a Missouri citizen and you logged into your account with Mosaic Health System's MyMLC patient portal between January 1, 2016, and December 13, 2022, a class action lawsuit may affect your rights.

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

- A class action lawsuit styled as *Jane Doe et al. v. Mosaic Health System, et al.*, Case No. 22BU-CC01774-01 is pending against Mosaic Health System and Heartland Regional Medical Center (together, "Defendants") arising out of alleged disclosures of the fact that patients logged in to the MyMLC patient portal between January 1, 2016 and December 13, 2022.
- Plaintiffs allege Defendants disclosed information through the deployment of Google Analytics embedded on its websites. The disclosed information includes class members' medical record numbers, email addresses, and patient portal usernames.
- The class includes:

All persons who are Missouri citizens and who, from January 1, 2016 to December 13, 2022, were patients of Mosaic Health System, who logged into the MyMLC Patient Portal, and who had their medical record number, email address, and/or patient portal username disclosed to Google.
- The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be at any time. However, if you are a class member described above, your legal rights are affected, and you have a choice to make now.

This Notice may affect your rights. Please read it carefully.

Your Legal Rights & Options		Deadline
Exclude Yourself	Get out of this lawsuit. Get no benefits if any are available in the future. Keep your right to sue separately. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not receive any money or benefits. You will keep any right to file your own lawsuit or be part of any other lawsuit against Defendants at your own expense, and with your own lawyer about the same legal claims in this lawsuit.	Postmarked or emailed by: October 16, 2026
Do Nothing	Stay in this lawsuit. Await the outcome. Give up the right to sue separately. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. You will give up your right to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by any future judgment in this lawsuit.	

- The Plaintiffs must prove their legal claims against Defendants at trial. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Defendants, you will be notified about how to receive your benefits.

Questions? Go to www.MosaicClassNotice.com or call 1-877-657-9877

BASIC INFORMATION

1. What is this Notice about?

This Notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you if you are a Missouri citizen who, from January 1, 2016 to December 13, 2022, were a patient of Mosaic Health System, logged into your account with the MyMLC Patient Portal, and had your medical record number, full or partial email address, and/or full or partial patient portal username disclosed to Google.

The Honorable Judge Schaefer of the Circuit Court of Buchanan County, Missouri is overseeing this class action. The lawsuit is known as *Jane Doe and Janice Doe v. Mosaic Health System and Heartland Regional Medical Center*, Case No. 22BU-CC1774-01 (the “lawsuit”). The individuals who filed this lawsuit are called the “Plaintiffs” and/or “Class Representatives” and the companies sued, Mosaic Health System and Heartland Regional Medical Center, are called the “Defendants.”

2. Why is this lawsuit a class action?

In a class action, one or more people (called class representatives) sue on behalf of all people who have similar legal claims. Together, all these people are called a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt-out) from the class.

THE LEGAL CLAIMS IN THE LAWSUIT

3. What is this lawsuit about?

Plaintiffs filed this lawsuit against Defendants on behalf of class members alleging the disclosure of certain information for patients who used the MyMLC patient portal between January 1, 2016 and December 13, 2022.

Plaintiffs allege Defendants disclosed information reflecting the fact of login to the MyMLC patient portal through the deployment of Google Analytics embedded on its websites. The disclosed information includes medical record numbers, email addresses, and patient portal usernames.

Defendants deny the legal claims and deny any wrongdoing or liability. No court or other judicial entity has made any judgment or other determination of wrongdoing by Defendants, or that any law has been violated.

4. Has the Court decided who is right?

The Court has not decided whether the Plaintiffs or Defendants are right. By establishing the class and providing this Notice, the Court has not decided and is not suggesting that Plaintiffs will win or lose this lawsuit. The parties have a chance to prove or disprove their legal claims and/or defenses. The Plaintiffs must prove their legal claims at a trial.

5. What are the Plaintiffs asking for?

The Plaintiffs are asking for money for the class members for Defendants’ alleged wrongdoings. The Plaintiffs are also asking for attorneys’ fees and costs for Class Counsel.

6. Is there any money or benefits available now?

No money or benefits are available now. The Court has not decided whether Defendants did anything wrong, and Plaintiffs and Defendants have not settled the lawsuit. There is no guarantee that money or benefits will be obtained in the future. You will be notified if money or benefits become available.

WHO IS IN THE CLASS

7. Am I part of the class?

The class includes:

All persons who are Missouri citizens and who, from January 1, 2016 to December 13, 2022, were patients of Mosaic Health System, who logged into the MyMLC Patient Portal, and who had their medical record number, full or partial email address, and/or full or partial patient portal username disclosed to Google.

8. What if I am still not sure whether I am a class member?

If you are still not sure whether you are a class member, you may go to www.MosaicClassNotice.com or call toll-free 1-877-657-9877.

YOUR RIGHTS AND OPTIONS

You must decide whether to stay in the class or ask to be excluded (and keep your right to sue Defendants in your own separate lawsuit).

9. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit in the future. By doing nothing you are staying in the class and if the Plaintiffs obtain money or benefits in the future, you will be notified about how to get your share. If you do nothing now, you will not be able to sue or continue to sue Defendants—as part of any other lawsuit—about the same legal claims in this lawsuit. You will also be legally bound by the orders and judgments.

10. Why would I ask to be excluded?

If you want to sue Defendants on your own regarding the same legal claims in this lawsuit, or already have your own lawsuit against Defendants regarding the same legal claims in this lawsuit and you want to continue with it, you need to ask to be excluded from the class. If you exclude or remove yourself from the class— sometimes called “opting-out” of the class— you will not get any money or benefits from this lawsuit even if Plaintiffs win at trial or there is a settlement. However, you may be able to sue or continue to sue Defendants on your own. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action lawsuit.

If you start your own lawsuit or continue with an existing lawsuit against Defendants regarding the same legal claims in this lawsuit after you exclude yourself, you will have to hire your own lawyer(s) for that lawsuit, and you will have to prove your legal claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon, because *your legal claims may be subject to a statute of limitations*, meaning that you may face a deadline after which you cannot sue.

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11. How do I ask the Court to exclude me from the class?

To exclude yourself from the class, you must email or mail a written request for exclusion, which includes the following:

- 1) Your name, address, telephone number, and email address (if any);
- 2) Your personal physical signature; and
- 3) A statement that you want to be excluded from the class, such as “I hereby request to be excluded from the class in *Jane Doe et al. v. Mosaic Health Systems, et al.*”

The exclusion request must be **mailed** to the Notice Administrator at the following address, and be **postmarked by October 16, 2026**:

Mosaic Privacy Litigation
Notice Administrator
PO Box 4748
Portland, OR 97208-4748

Alternatively, your exclusion request may be **emailed** to the Notice Administrator at the following address, and be **sent by October 16, 2026**:

info@mosaicclassnotice.com

You cannot opt-out (exclude yourself) by telephone.

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of class members or multiple class members where the opt-out hasn’t been signed by each and every individual class member will not be allowed.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the lawsuit?

Yes. The Court has appointed Foster C. Johnson of Ahmad, Zavitsanos & Mensing, PLLC, Stephen M. Gorny of Gorny Dandurand, LC, Jay Barnes of Simmons Hanly Conroy, LLP, and Raina C. Borrelli of Turke & Strauss LLP as Class Counsel to represent you and the class for the purposes of this lawsuit. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this lawsuit.

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you can hire your own lawyer at your own expense. For example, you can ask them to appear in Court for you if you want someone other than Class Counsel to speak for you.

14. How will Class Counsel be paid?

If Class Counsel gets money or benefits for the class, they may ask the Court for an award of attorneys’ fees and expenses. You will not have to personally pay these attorneys’ fees and expenses. If the Court grants Class Counsels’ request, the attorneys’ fees and expenses will either be deducted from any money obtained for the class or paid separately by Defendants.

THE TRIAL

15. How and when will the Court decide who is right?

Class Counsel will have to prove Plaintiffs' legal claims at a trial. Trial is scheduled to begin on October 26, 2026 at 9:00 a.m. CT at the Buchanan County Courthouse, 411 Jules St., St. Joseph, MO 64501. During the trial, a Jury and the Judge will hear all of the evidence to help them reach a decision about whether Plaintiffs or Defendants are right about the legal claims in the lawsuit. There is no guarantee that the Plaintiffs will win, or that they will get any money for the class.

16. Do I have to attend the trial?

No. You do not need to attend the trial. Class Counsel will present the case for the Plaintiffs and the class, and lawyers for Defendants will present on their behalf. You or your own lawyer may attend at your own expense.

17. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of the lawsuit, and you remain in the class, you will be notified about how to participate to receive money or benefits. It is unknown how long this will take.

GET MORE INFORMATION

18. How do I get more information about the Settlement?

This Notice contains a summary of the lawsuit and the proceedings. You can get additional information by visiting www.MosaicClassNotice.com, calling 1-877-657-9877, or writing the Notice Administrator at:

Mosaic Privacy Litigation
Notice Administrator
PO Box 4748
Portland, OR 97208-4748

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S CLERK OFFICE
REGARDING THIS NOTICE.**

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