If You Visited a Website or Patient Portal Operated by the Retina Entities During the Alleged Implementation of Web Tracking Technologies, You May Be Entitled to Compensation.

A court authorized this notice. This is not a solicitation from a lawyer.

This is a Court-authorized Class Notice of a proposed Settlement in a class action lawsuit, *Sarah Goodman and Stance Schudy v. Illinois Retina Associates, PLLC, Northern California Advanced Surgery Center, LP, and Retina Group, Inc. d/b/a Retina Consultants of America*, No. **2026-CH-05572** ("Action"), pending in the **Circuit Court of Cook County, Illinois, County Department, Chancery Division**. The Settlement involves these defendants and certain affiliated retinal practices, collectively referred as the "Retina Entities." The Settlement will resolve a lawsuit brought on behalf of persons who allege the Retina Entities used Meta Pixel, Google Analytics, Google Tag Manager, and other web tracking technologies on their websites and patient portals to transmit personally identifiable information and protected health information to third parties, including Meta (Facebook) and Google, without consent, between October 24, 2019, and October 31, 2025. The Retina Entities deny these allegations, deny violations of any law, and deny all liability.

Who is a Class Member?

The Settlement Class consists of two subclasses:

- **Portal Subclass:** All individuals residing in the United States who accessed the portal pages through any of the Retina Entities' Websites during the alleged implementation period of Meta Pixel, Google Analytics, Google Tag Manager, or other advertising tracking technology, as reflected in available portal interaction data.
- **Visitor Subclass:** All individuals residing in the United States who accessed any of the Retina Entities' Websites during the alleged implementation period of Meta Pixel, Google Analytics, Google Tag Manager or other advertising tracking technology as reflected in available website interaction data, and who are not part of the Portal Subclass.

"Retina Entities" or "Defendants" means Retina Group, Inc. d/b/a Retina Consultants of America; Northern California Advanced Surgery Center, LP; Vitro-Retinal Medical Group, Inc. d/b/a Retinal Consultants Medical Group; Austin Retina Associates, PLLC; California Retina Consultants, PC; Colorado Retina Associates, PLLC; Florida Retina Institute James A. Staman, M.D., LLC; Illinois Retina Associates, PLLC; Mississippi Retina Associates, PLLC; Retina Associates, PLLC d/b/a North Carolina Retina Associates, P.C.; Pacific Northwest Retina, PLLC; Palmetto Retina Center, LLC; Retina Associates, LLC; Retina Associates of Utah, PLLC; Vitreoretinal Surgery, PLLC (a/k/a Minnesota Retina Associates, LLC); Retina Consultants of Houston, PLLC d/b/a Retina Consultants of Texas; Retina Consultants, P.C. d/b/a The Retina Eye Center; Retina Vitreous Consultants LLP d/b/a Retina Group of Florida; Thompson & Sjaarda, P.A. d/b/a Retina Specialists; Carson, McBeath, and Boswell, Inc. d/b/a South Coast Retina

Center; Tennessee Retina, P.C.; and Long Island Vitreoretinal Consultants, P.C. d/b/a Vitreoretinal Consultants of NY; Northeast Wisconsin Retina Associates, S.C.; and Retina Consultants of Southern Colorado, PLLC.

A List of the websites at issue is below:

https://www.retinalmd.com/	https://www.retinagroupflorida.com/
https://www.retinaspec.com/	https://www.newretinamd.com/
https://www.ncretina.com/	https://www.southcoastretinacenter.com/
https://www.coloradoretina.com/	https://www.tnretina.com/
https://www.norcalasc.com/	https://www.rcaresearch.com/
https://www.floridaretinainstitute.com/	https://www.illinoisretina.com/
https://www.retinaeyecenter.com/	https://www.austinretina.com/
https://www.msretina.com/	https://www.retinacolorado.com/
https://www.retinautah.com/	https://www.kcretina.com/
https://www.pnwretina.com/	https://www.californiaretina.com/
https://www.palmettoretina.com/	https://www.retinamn.com/
https://www.vrcny.com/	https://www.retinaconsultantstexas.com/
https://www.retinaconsultantsofamerica.com/	

What are the benefits?

The Settlement provides the following benefits:

• **Pro Rata Cash Subclass Payment:** The Settlement Fund of $4,500,000.00 is allocated $1,175,160.00 to the Portal Subclass and $3,324,840.00 to the Visitor Subclass. No documentation required.

• **Credit Monitoring and Insurance Services (CMIS):** All Class Members who submit a valid Claim Form may elect to receive one (1) year of Credit Monitoring and other services, including up to $1,000,000 in identity theft insurance and one (1) bureau credit monitoring.

• **Business Practice Changes and Injunctive Relief:** The Retina Entities have agreed that for two (2) years from the Effective Date they will not deploy Meta Pixel or substantially similar cross-context behavioral advertising tracking technologies on the publicly available portions of

their Websites for cross-context behavioral advertising, unless such deployment is consistent with applicable law.

What are my options?

- **Submit A Claim**: To receive benefits, you must submit a Claim Form online at **www.RetinaSettlement.com** or by mail. Claim Forms must be submitted or postmarked by **January 15, 2027**. **If you do not submit a Claim Form, you will not receive Settlement benefits.**
- **Do Nothing:** If you do nothing, you remain in the Settlement. You give up your rights to sue but you will not get any compensation.
- **Exclude Yourself:** You may get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. To exclude yourself, submit a Request for Exclusion to the Settlement Administrator by email at info@RetinaSettlement.com or by mail to Retina Settlement Administrator, P.O. Box 3958, Baton Rouge, LA 70821, emailed or postmarked by **December 31, 2026**. See www.RetinaSettlement.com for what a Request for Exclusion must include.
- **Object:** You may stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted to the Settlement Administrator by email at info@RetinaSettlement.com or by mail to Retina Settlement Administrator, P.O. Box 3958, Baton Rouge, LA 70821, emailed or postmarked by December 31, 2026. See www.RetinaSettlement.com for what an objection must include. The Court will hear from any Settlement Class Member who attends the Final Fairness Hearing regardless of whether a prior written objection was submitted.
- **Attend a hearing:** The Court will hold the Final Fairness Hearing on **February 22, 2027, at 9:30 a.m. CST** to consider whether the proposed Settlement is fair, reasonable, and adequate; to consider Class Counsel's request for attorneys' fees not to exceed **$1,575,000.00** (35% of the Settlement Fund) plus reasonable expenses not to exceed $50,000; and to consider Service Awards of **$5,000** for each Class Representative (**$10,000** total).

This is only a summary. For additional information, including a copy of the Settlement Agreement and other documents, visit **www.RetinaSettlement.com** or contact Class Counsel. You may also contact the Settlement Administrator to update your address or contact information by visiting the Settlement Website or calling **1-855-912-3786**.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.