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*Class Counsel*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JOHN DOE, JOHN DOE II, JOHN DOE III,  
JANE DOE, JANE DOE II, JANE DOE III,  
JANE DOE IV, JANE DOE V, and ALEXIS  
SUTTER, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,  
INC., KAISER FOUNDATION HOSPITALS,  
and KAISER FOUNDATION HEALTH PLAN  
OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**SUPPLEMENTAL DECLARATION OF  
TYLER S. GRADEN IN SUPPORT OF  
PLAINTIFFS' REPLY IN FURTHER  
SUPPORT OF (I) PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF PROPOSED  
CLASS ACTION SETTLEMENT AND  
PLAN OF ALLOCATION; AND (II)  
CLASS COUNSEL'S MOTION FOR  
ATTORNEYS' FEES, LITIGATION  
EXPENSES, AND SERVICE AWARDS**

Judge: Hon. Edward M. Chen  
Date: May 7, 2026  
Time: 1:30 p.m.  
Court: 5

CMC Filed: December 6, 2024  
Trial Date: January 25, 2027

1 I, Tyler S. Graden, hereby declare as follows:

2 1. I, Tyler S. Graden, am a partner at the law firm of Kessler Topaz Meltzer & Check,  
3 LLP (“KTMC”). KTMC, together with Carella Byrne Cecchi Brody & Agnello, PC (“Carella  
4 Byrne” and, together with KTMC, “Class Counsel”), serve as counsel for Plaintiffs John Doe, John  
5 Doe II, Jane Doe, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe V, and Alexis Sutter  
6 (collectively, “Plaintiffs”) and the proposed Settlement Class (“Settlement Class”) in the above-  
7 captioned matter (“Action”). I have personal knowledge of the matters set forth herein, based on  
8 my active supervision of and participation in the prosecution and resolution of the Action. If called  
9 upon to do so, I could and would testify competently thereto.

10 2. I submit this Declaration in support of Plaintiffs’ Reply in Further Support of (I)  
11 Plaintiffs’ Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation;  
12 and (II) Class Counsel’s Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards.

13 3. As represented at Preliminary Approval, the \$46 million common-fund recovery  
14 could be increased up to \$47.5 million if certain conditions set forth in the Parties’ Confidential  
15 Supplemental Agreement were met. Based on those conditions, Class Counsel currently anticipates  
16 that the Settlement will be increased to the maximum amount of \$47.5 million. To the extent this  
17 changes, Class Counsel and the Settlement Administrator will provide supplemental declarations  
18 in advance of the Fairness Hearing.

19 4. As of March 26, 2026, Class Counsel have responded to at least 873 inquiries  
20 regarding the Settlement via email and received over 497 inbound calls.<sup>1</sup>

21 5. As of March 26, 2026, a total of eleven (11) objections have been received outside of  
22 the Court-ordered procedure for submitting an objection in the Action (“Informal Objections”). The  
23 Informal Objections are attached to this Declaration as **Exhibits A through K**.

24 6. From October 1, 2025 to February 28, 2026, Class Counsel have expended an  
25 additional 547.40 hours, or \$518,189.50, on this matter.

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<sup>1</sup> I have been advised of the total number of emails and phone calls received by Carella Byrne and  
the numbers in Paragraph 4 reflect combined numbers from both firms.

1 7. Finally, after considering the objection filed at ECF No. 409, the Parties have agreed  
2 to include a second potential *cy pres* recipient with a focus on data privacy: the Privacy Rights  
3 Clearinghouse. As a recipient of many privacy-related *cy pres* awards, the Privacy Rights  
4 Clearinghouse “use[s] funding from *cy pres* awards to educate people about their privacy rights and  
5 choices, research emerging consumer privacy issues, create and improve research tools like our Data  
6 Breach Chronology and our Data Broker Database, and weigh in on policy proceedings with a  
7 consumer rights perspective.”<sup>2</sup>

8 I declare under penalty of perjury that the foregoing is true and correct.

9  
10 Executed this 2nd day of April, 2026.

11 By: /s/ Tyler S. Graden  
12 Tyler S. Graden

13 **KESSLER TOPAZ**  
14 **MELTZER & CHECK, LLP**

15 *Counsel for Plaintiffs and the proposed*  
16 *Settlement Class*

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28 <sup>2</sup> *Cy Pres Awards*, Privacy Rights Clearinghouse, <https://privacyrights.org/cypres> (last visited Apr. 2, 2026).

# EXHIBIT A

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**To:** Jennifer L. Enck; Tyler S. Graden; Alex Park  
**Subject:** RE: Kaiser Contact Form Contact Form - I have a question about the case

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**From:** Cornelia Vieira <[cvieira@strategicclaims.net](mailto:cvieira@strategicclaims.net)>  
**Sent:** Thursday, February 19, 2026 3:12 PM  
**To:** Tyler S. Graden <[tgraden@ktmc.com](mailto:tgraden@ktmc.com)>; Kevin Cooper <[kcooper@carellabyrne.com](mailto:kcooper@carellabyrne.com)>  
**Cc:** Melissa Yeates <[myeates@ktmc.com](mailto:myeates@ktmc.com)>; Lyndsay Houser <[lhouser@carellabyrne.com](mailto:lhouser@carellabyrne.com)>; Paul Mulholland <[pmulholland@strategicclaims.net](mailto:pmulholland@strategicclaims.net)>; Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** FW: Kaiser Contact Form Contact Form - I have a question about the case

**\*External E-Mail\***

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Good afternoon Tyler and Kevin,

While we have not received any official objection from this class member, I wanted to bring the below email we received to your attention.

Thank you,

Cornelia



**Cornelia Vieira**

Finance and Project Manager  
O. 866.274.4004, ext. 1016  
D. 484-206-8692  
E. [cvieira@strategicclaims.net](mailto:cvieira@strategicclaims.net)  
Strategic Claims Services, Inc.  
600 North Jackson Street, Suite 205  
Media, PA 19063  
[strategicclaims.net](http://strategicclaims.net)

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**From:** Claims Analyst <[info@strategicclaims.net](mailto:info@strategicclaims.net)>  
**Sent:** Thursday, February 19, 2026 12:01 PM  
**To:** Cornelia Vieira <[cvieira@strategicclaims.net](mailto:cvieira@strategicclaims.net)>  
**Subject:** FW: Kaiser Contact Form Contact Form - I have a question about the case

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**From:** [REDACTED] <[info@kaiserprivacysettlement.com](mailto:info@kaiserprivacysettlement.com)>  
**Sent:** Saturday, January 17, 2026 7:22 PM

To: Claims Analyst <[info@strategicclaims.net](mailto:info@strategicclaims.net)>

Subject: Kaiser Contact Form Contact Form - I have a question about the case

<b>First and Last Name</b>
[REDACTED]
<b>Email</b>
[REDACTED]
<b>Phone</b>
[REDACTED]
<b>Settlement Class Member Unique ID</b>
[REDACTED]
<b>Reason for Contact</b>
I have a question about the case
<b>Your Question</b>
I simply object to lawyers enriching themselves to the tune of \$15mil in the name of protecting consumers like me without me having any say in it. The \$45mil settlement will only come back to me and other Kaiser patients in higher healthcare premiums. I don't want \$20-40 from a settlement so that my premiums can go up \$30-50 to pay for a sleazy lawyer making \$400/hour.

**IMPORTANT:** The information contained in this message is confidential and is intended only for the named addressee(s). If the reader of this message is not an intended recipient (or the individual responsible for the delivery of this message to an intended recipient), please be advised that any re-use, dissemination, distribution or copying of this message is prohibited. If you have received this message in error, please reply to the sender that you have received the message in error and then delete it. Thank you SCS

# EXHIBIT B

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, January 15, 2026 at 4:27 PM

## Ticket #395995

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/13/26 2:40 PM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	1/15/26 4:27 PM
<b>Due Date</b>	1/14/26 2:40 PM	<b>Last Message</b>	1/13/26 2:44 PM

### Ticket Details

<b>Case:</b>	Kaiser
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### Claim [REDACTED]

1/13/26 2:40 PM Claim [REDACTED]

I am filing my claim. Your website is broken and looping. Please confirm receipt.

[REDACTED]

**Tuesday January 13 2026**

**Attn: Kaiser Privacy Settlement Administrator**  
**Re: Statement of Dispute Regarding**  
**Settlement Amount - Case No. 3:23-cv-02865-**  
**EMC**

**Class Member ID:** [REDACTED]

**SUPPORT CENTER**  
Support Ticket System

Strategic Claims Services, Inc. Thursday, January 15, 2026 at 4:27 PM

**To the Settlement Administrator,  
I am writing to formally express my dissatisfaction with the proposed compensation amount for the John Doe, et al. v. Kaiser Foundation Health Plan, Inc. settlement.**

**As a consumer and former member, I trusted Kaiser with my private medical information. The fact that I have been contacted as a class member confirms that my data was among that which was shared with third-party tech companies. This is a major breach of security and personal privacy.**

**I believe the estimated payment of \$20-\$40 is insufficient for the following reasons:**

- Sensitivity of Data: This wasn't just a leaked email address; this involved tracking my movements on a medical portal. That information is highly personal and worth far more than a \$40 "slap on the wrist."**
- Corporate Accountability: For a company of Kaiser's size, this settlement amount does**



# EXHIBIT C

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, February 27, 2026 at 1:25 PM

## Ticket #958712

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/15/26 1:48 PM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	2/27/26 1:24 PM
<b>Due Date</b>	1/16/26 1:48 PM	<b>Last Message</b>	1/15/26 1:48 PM

### Ticket Details

<b>Case:</b>	Kaiser
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## Re: Notice of Proposed Class Action Settlement - Kaiser Privacy Breach Settlement

1/15/26 1:48 PM Re: Notice of Proposed Class Action Settlement - Kaiser Privacy Breach Settlement [REDACTED]

I object

On Thu, Jan 15, 2026, 6:51 AM Settlement Administrator <[info@kaiserprivacysettlement.com](mailto:info@kaiserprivacysettlement.com)> wrote:

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, February 27, 2026 at 1:25 PM

Dear Settlement Class Member:

You are receiving this email from Strategic Claims Services because we are the Settlement Administrator for the above-referenced litigation.

Your Class Member ID Number is: [REDACTED]

**THIS NOTICE PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT AND A POTENTIAL PAYMENT FROM A SETTLEMENT FUND OF \$46 TO \$47.5 MILLION.**

Please visit [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com) for more information.

The parties in the lawsuit *John Doe, et al. v. Kaiser Foundation Health Plan, Inc., et al.*, Case No. 3:23-cv-02865-EMC (N.D. Cal.) ("Action") have reached a proposed settlement of claims ("Settlement") in a pending class action against Kaiser Foundation Health Plan, Inc. ("Defendant") and certain related entities. If approved, the Settlement will resolve this Action wherein Plaintiffs allege that Defendant's websites and mobile applications disclosed their confidential personal information due to third-party software code. Plaintiffs allege that this code was embedded across Defendant's platforms, including the secure patient portal, and transmitted information to third parties when users navigated these platforms. Defendant firmly denies the allegations, denying any liability or wrongdoing, and denies that Plaintiffs are entitled to any relief arising from this Action. Defendant also maintains that Plaintiffs have not suffered any damages arising from this Action. Additional information regarding the Action and the Settlement can be found in the Amended Stipulation of Settlement dated December 1, 2025 ("Stipulation") and the long-form notice ("Notice") available at [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).

You received this notice because your contact information was provided by Defendant for purposes of providing notice of the Settlement and you may be a member of the following Settlement Class: **Any and all Kaiser members (i.e., current and former enrollees of the Kaiser Foundation Health Plan or any of its affiliates) in the following operating states: California, Colorado, Georgia, Hawaii, Maryland, Oregon, Virginia, Washington, and the District of Columbia, who accessed the authenticated pages of the Kaiser Permanente websites or mobile applications listed below from November 2017 to May 2024:**

**Websites:**

<https://wa-member.kaiserpermanente.org>  
<https://healthy.kaiserpermanente.org>  
<https://mydoctor.kaiserpermanente.org>

**Mobile Applications:**

Kaiser Permanente Washington App  
 Kaiser Permanente App  
 My Doctor Online (NCAL Only) App  
 My KP Meds App  
 KP Health Ally App

Certain persons (e.g., Defendant and related entities, Kaiser Permanente Members Who Have Chosen To Arbitrate, etc.) are expressly excluded from the Settlement Class as detailed in the Stipulation and Notice. Please review these documents for further information regarding membership in the Settlement Class.

Pursuant to the Settlement, Defendant has agreed to pay **\$46,000,000.00**, which, after deducting any Court-awarded fees and expenses, notice and administration costs, and taxes, will be allocated among Settlement Class Members who submit Claim Forms, in exchange for the Settlement of the Action and the release of all claims asserted in the Action and related claims. The Settlement Amount may be increased, but in no event will it exceed forty-seven million and five hundred thousand dollars (\$47,500,000.00), depending on certain conditions of the confidential Supplemental Agreement. **For additional information regarding the Settlement, please review the full Notice available at [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).** If you are a Settlement Class Member, your pro rata share of the Settlement will depend on the number of valid Claim Forms submitted. Your actual share of the Settlement will be determined pursuant to the Plan of Allocation posted on the Settlement website, or other plan ordered by the Court.

**To qualify for a payment from the Settlement, you must submit a Claim Form.** The Claim Form can be found and submitted on the Settlement website, or you can request that one be mailed to you. **Claim Forms must be postmarked (if mailed), or submitted online, by March 12, 2026.** If you do not want to be legally bound by any releases, judgments, or orders in the Action, **you must exclude yourself** from the Settlement Class by March 12, 2026. If you exclude yourself from the Settlement Class, you may be able to sue Defendant and/or its related entities about the claims being resolved in the Action, but you cannot get money from the Settlement. If you want to object to any aspect of the Settlement, you must file or mail an objection by **March 12, 2026**. The Notice provides instructions on how to submit a Claim Form, exclude yourself from the Settlement Class, or object, and you must comply with all of the instructions in the Notice. If you object to the Settlement, you will remain a member of the Settlement Class and must still submit a Claim Form to be issued a payment.

The Court will hold a hearing on **May 7, 2026 at 1:30 p.m.** ("Fairness Hearing"), to consider, among other things, whether to approve the Settlement and a request by the lawyers representing the Settlement Class for an award of up to \$15,675,000 in attorneys' fees, plus litigation expenses of no more than \$900,000. The named Plaintiffs will also request service awards of up to \$5,000 each for their efforts in representing the Settlement Class in the Action. You may attend the Fairness Hearing and ask to be heard by the Court, but you do not have to. **For more information, call 1-855-783-3816, send an email to [info@KaiserPrivacySettlement.com](mailto:info@KaiserPrivacySettlement.com), or visit [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).**

Sincerely,

Kaiser Privacy Breach Settlement Administrator  
 c/o Strategic Claims Services  
 600 N Jackson St - Suite 205  
 Media, PA 19063  
[info@kaiserprivacysettlement.com](mailto:info@kaiserprivacysettlement.com)

*If you would like to unsubscribe from future email communications regarding this case, please click the link below. We are the Notice Administrator for this case and we were provided your information because you were identified as a potential Class Member. Your information will only be used to provide you communications regarding this case and not for any other purpose.*

*Unsubscribing from emails regarding this case does not remove you from the class list and you may still receive communications via regular mail as required by the Court. Unsubscribing from emails is not the same as opting out or excluding yourself from the case. Please refer to the information you received about the case for more information regarding that process.*

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, February 27, 2026 at 1:25 PM

I have read the above and would like to unsubscribe from future email communications regarding this case. [click here](#)

2/27/26 12:30 PM Ticket Assigned to Test Agent

Felicia Clemons

objection

2/27/26 1:24 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Kaiser Privacy Breach Settlement*.

We have received your information. Please see the instructions on p. 12 of the attached Notice/Claim Form regarding how to properly object to the terms of the Settlement.

Feel free to contact the office if you have any further questions.

Thank you.

KaiserNoticeClaimCombined.pdf (511.6 kb)

# EXHIBIT D

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 3:07 PM

## Ticket #442599

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/15/26 12:24 PM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	2/26/26 3:07 PM
<b>Due Date</b>	1/16/26 12:24 PM	<b>Last Message</b>	1/15/26 12:24 PM

### Ticket Details

<b>Case:</b>	Kaiser
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## Kaiser Contact Form Contact Form - I have a question about the case

1/15/26 12:24 PM Kaiser Contact Form Contact Form - I have a question about the case Kaiser Website

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**First and Last Name**  
[REDACTED]

**Email**  
[REDACTED]

**Phone**  
[REDACTED]

**Settlement Class Member Unique ID**  
[REDACTED]

**Reason for Contact**  
I have a question about the case

**Your Question**  
I would like to object. I would like to write a letter why I'm objecting. How do I do this?

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 3:07 PM

2/26/26 2:43 PM Ticket Assigned to Test Agent	Felicia Clemons
objection	
2/26/26 3:07 PM	Test Agent
<p>Good afternoon,</p> <p>Thank you for contacting us regarding the Kaiser Privacy Breach Settlement.</p> <p>Instructions regarding objections can be found on p. 12 of the attached Notice/Claim Form.</p> <p>If you have any further questions, please feel free to contact our office.</p> <p>Thank you.</p> <hr/> <p>KaiserNoticeClaimCombined.pdf (511.6 kb)</p>	

# EXHIBIT E

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 10:22 AM

## Ticket #463426

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/15/26 11:26 AM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	2/26/26 10:22 AM
<b>Due Date</b>	1/16/26 11:26 AM	<b>Last Message</b>	1/15/26 11:26 AM

### Ticket Details

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<b>Case:</b>	Kaiser
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**Class action suit without merit, egregious waste of my health care resources**

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 10:22 AM

1/15/26 11:26 AM Class action suit without merit, egregious waste of my health care resources 

I am writing to voice strong opposition to the lawsuit *John Doe, et al. v. Kaiser Foundation Health Plan, Inc., et al.*, Case No. 3:23-cv-02865-EMC (N.D. Cal.).

Kaiser Permanente maintains a website and a mobile application for the use of members to have better transparency in managing and maintaining their own care. There is no evidence whatsoever of a data breach nor the health plan using member data in any other way than in support of the care of the patient.

This is blatant misuse of the court system designed to benefit a very small legal team set only on taking the monetary reward should the suit for some reason be found in favor of the plaintiff.

I resent the misuse of our legal system; I resent the risk of delivering quality care to health plan members introduced by the lawsuit.

I will unsubscribe. It's my hope this pursuit is found liable for the court costs for a suit not worth the time it took to compose this email.



2/26/26 10:07 AM Ticket Assigned to Test Agent

Felicia Clemons

possible opt-out

2/26/26 10:22 AM

Test Agent

Good morning,

Thank you for contacting us regarding the *Kaiser Privacy Breach Settlement*.

Please note your rights/options with respect to the Settlement as summarized beginning at the bottom of p. 3 of the attached Notice and Claim Form (submit a claim, do nothing, object, opt out etc.). Detailed instructions are provided for how to properly act on the option(s) you decide upon.

If you have any further questions, please feel free to contact our office.

Thank you.

# EXHIBIT F

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 4:05 PM

## Ticket #300420

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/15/26 12:24 PM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	2/26/26 4:05 PM
<b>Due Date</b>	1/16/26 12:24 PM	<b>Last Message</b>	1/15/26 12:24 PM

### Ticket Details

<b>Case:</b>	Kaiser
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## Kaiser Contact Form Contact Form - I have a question about the case

1/15/26 12:24 PM Kaiser Contact Form Contact Form - I have a question about the case	Kaiser Website

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 4:05 PM

**First and Last Name**

[REDACTED]

**Email**

[REDACTED]

**Phone**

[REDACTED]

**Settlement Class Member Unique ID**

[REDACTED]

**Reason for Contact**

I have a question about the case

**Your Question**

I actually am completely against this claim. This is all about attorneys making money. I am certain Kaiser did not do this on purpose. The 40 or 50 dollars that will go to members is not going to make a difference. It would be more important that all this money gets to be put to make Kaiser better and perhaps use it to serve people that can not afford healthcare! Where do I get a form to send to the court to object this whole lawsuit.

This kind of thing makes US broken, waste of time money and resources.

[REDACTED]

2/26/26 2:46 PM Ticket Assigned to Test Agent

Felicia Clemons

possible objection or opt out

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Thursday, February 26, 2026 at 4:05 PM

2/26/26 3:03 PM	Test Agent
<p>Good afternoon,</p> <p>Thank you for contacting us regarding the <i>Kaiser Privacy Breach Settlement</i>.</p> <p>To properly opt out of the litigation, you can complete and submit an online opt out form here:</p> <p><a href="https://kaiserprivacysettlement.com/online-opt-out-form/">https://kaiserprivacysettlement.com/online-opt-out-form/</a></p> <p>You may alternately complete and submit the attached form by mail, fax, or email. If you have any further questions, please feel free to contact our office.</p> <p>Thank you.</p> <hr/> <p>Kaiser Opt-Out Form.pdf (62.5 kb)</p>	
2/26/26 3:05 PM	Test Agent
<p>fwd CV KD, saved PDF</p>	
2/26/26 4:05 PM	Test Agent
<p>Good afternoon,</p> <p>Further to your inquiry regarding <b>objecting</b> to the Settlement, rather than opting out of the Settlement:</p> <p>Please note instructions provided on <b>p. 12</b> of the attached Notice/Claim Form with regard to objecting to the Settlement. Apologies for any confusion in previous response.</p> <p>If you have any further questions, please feel free to contact our office.</p> <p>Thank you.</p> <hr/> <p>KaiserNoticeClaimCombined.pdf (511.6 kb)</p>	

# EXHIBIT G

**SUPPORT CENTER**  
Support Ticket System

Strategic Claims Services, Inc. Friday, February 20, 2026 at 12:19 PM

# Ticket #108760

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/14/26 5:35 PM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	2/20/26 12:19 PM
<b>Due Date</b>	1/15/26 5:35 PM	<b>Last Message</b>	1/14/26 5:35 PM

**Ticket Details**

<b>Case:</b>	Kaiser
<b>Control Number:</b>	[REDACTED]

## Bullshit: I object to the settlement

1/14/26 5:35 PM Bullshit: I object to the settlement [REDACTED]	
<p>I'm applicable to receive the 20-40 dollar expected payment based on an estimated damage claim of 5,000 dollars per affected person which doesn't make any sense. Also based on the plaintiff attorneys taking 15 million of the 45 million settlement this is ridiculous. The healthcare system has problems. Many problems. But this is a scam.</p>	
2/20/26 10:58 AM Ticket Assigned to Test Agent	Felicia Clemons
object to settlement	

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, February 20, 2026 at 12:19 PM

2/20/26 12:19 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Kaiser Privacy Breach Settlement*. We have received your information.

With respect to objecting to the terms of the Settlement: Please see p. 12 of the attached Notice/Claim Form for instructions regarding how to formally/properly submit any objections you may wish to submit.

If you have any further questions, please feel free to contact our office.

Thank you.

KaiserNoticeClaimCombined.pdf (511.6 kb)

# EXHIBIT H

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Wednesday, March 11, 2026 at 9:36 AM

## Ticket #534766

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/23/26 4:02 AM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	3/11/26 9:35 AM
<b>Due Date</b>	1/24/26 4:02 AM	<b>Last Message</b>	1/23/26 4:02 AM

### Ticket Details

**Case:** Kaiser

## Re: Notice of Proposed Class Action Settlement - Kaiser Privacy Breach Settlement

1/23/26 4:02 AM Re: Notice of Proposed Class Action Settlement - Kaiser Privacy Breach Settlement [REDACTED]

Dear Settlement Administrator,

I am writing regarding the Kaiser Privacy Breach Settlement (Case No. 3:23-cv-02865-EMC). My Class Member ID is [REDACTED].

Please send a paper Claim Form to my mailing address:

[Mailing Address]

[REDACTED]

I intend to submit this form and proceed with filing an objection to the settlement.

Best regards,

[REDACTED]

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Wednesday, March 11, 2026 at 9:36 AM

On Thu, Jan 15, 2026, 2:31 AM Settlement Administrator <[info@kaiserprivacysettlement.com](mailto:info@kaiserprivacysettlement.com)> wrote:

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Wednesday, March 11, 2026 at 9:36 AM

Dear Settlement Class Member:

You are receiving this email from Strategic Claims Services because we are the Settlement Administrator for the above-referenced litigation.

Your Class Member ID Number is: [REDACTED]

**THIS NOTICE PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT AND A POTENTIAL PAYMENT FROM A SETTLEMENT FUND OF \$46 TO \$47.5 MILLION.**

Please visit [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com) for more information.

The parties in the lawsuit *John Doe, et al. v. Kaiser Foundation Health Plan, Inc., et al.*, Case No. 3:23-cv-02865-EMC (N.D. Cal.) ("Action") have reached a proposed settlement of claims ("Settlement") in a pending class action against Kaiser Foundation Health Plan, Inc. ("Defendant") and certain related entities. If approved, the Settlement will resolve this Action wherein Plaintiffs allege that Defendant's websites and mobile applications disclosed their confidential personal information due to third-party software code. Plaintiffs allege that this code was embedded across Defendant's platforms, including the secure patient portal, and transmitted information to third parties when users navigated these platforms. Defendant firmly denies the allegations, denying any liability or wrongdoing, and denies that Plaintiffs are entitled to any relief arising from this Action. Defendant also maintains that Plaintiffs have not suffered any damages arising from this Action. Additional information regarding the Action and the Settlement can be found in the Amended Stipulation of Settlement dated December 1, 2025 ("Stipulation") and the long-form notice ("Notice") available at [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).

You received this notice because your contact information was provided by Defendant for purposes of providing notice of the Settlement and you may be a member of the following Settlement Class: **Any and all Kaiser members (i.e., current and former enrollees of the Kaiser Foundation Health Plan or any of its affiliates) in the following operating states: California, Colorado, Georgia, Hawaii, Maryland, Oregon, Virginia, Washington, and the District of Columbia, who accessed the authenticated pages of the Kaiser Permanente websites or mobile applications listed below from November 2017 to May 2024:**

**Websites:**

<https://wa-member.kaiserpermanente.org>  
<https://healthy.kaiserpermanente.org>  
<https://mydoctor.kaiserpermanente.org>

**Mobile Applications:**

Kaiser Permanente Washington App  
 Kaiser Permanente App  
 My Doctor Online (NCAL Only) App  
 My KP Meds App  
 KP Health Ally App

Certain persons (e.g., Defendant and related entities, Kaiser Permanente Members Who Have Chosen To Arbitrate, etc.) are expressly excluded from the Settlement Class as detailed in the Stipulation and Notice. Please review these documents for further information regarding membership in the Settlement Class.

Pursuant to the Settlement, Defendant has agreed to pay **\$46,000,000.00**, which, after deducting any Court-awarded fees and expenses, notice and administration costs, and taxes, will be allocated among Settlement Class Members who submit Claim Forms, in exchange for the Settlement of the Action and the release of all claims asserted in the Action and related claims. The Settlement Amount may be increased, but in no event will it exceed forty-seven million and five hundred thousand dollars (\$47,500,000.00), depending on certain conditions of the confidential Supplemental Agreement. **For additional information regarding the Settlement, please review the full Notice available at [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).** If you are a Settlement Class Member, your pro rata share of the Settlement will depend on the number of valid Claim Forms submitted. Your actual share of the Settlement will be determined pursuant to the Plan of Allocation posted on the Settlement website, or other plan ordered by the Court.

**To qualify for a payment from the Settlement, you must submit a Claim Form.** The Claim Form can be found and submitted on the Settlement website, or you can request that one be mailed to you. **Claim Forms must be postmarked (if mailed), or submitted online, by March 12, 2026.** If you do not want to be legally bound by any releases, judgments, or orders in the Action, **you must exclude yourself** from the Settlement Class by March 12, 2026. If you exclude yourself from the Settlement Class, you may be able to sue Defendant and/or its related entities about the claims being resolved in the Action, but you cannot get money from the Settlement. If you want to object to any aspect of the Settlement, you must file or mail an objection by **March 12, 2026**. The Notice provides instructions on how to submit a Claim Form, exclude yourself from the Settlement Class, or object, and you must comply with all of the instructions in the Notice. If you object to the Settlement, you will remain a member of the Settlement Class and must still submit a Claim Form to be issued a payment.

The Court will hold a hearing on **May 7, 2026 at 1:30 p.m.** ("Fairness Hearing"), to consider, among other things, whether to approve the Settlement and a request by the lawyers representing the Settlement Class for an award of up to \$15,675,000 in attorneys' fees, plus litigation expenses of no more than \$900,000. The named Plaintiffs will also request service awards of up to \$5,000 each for their efforts in representing the Settlement Class in the Action. You may attend the Fairness Hearing and ask to be heard by the Court, but you do not have to. **For more information, call 1-855-783-3816, send an email to [info@KaiserPrivacySettlement.com](mailto:info@KaiserPrivacySettlement.com), or visit [www.KaiserPrivacySettlement.com](http://www.KaiserPrivacySettlement.com).**

Sincerely,

Kaiser Privacy Breach Settlement Administrator  
 c/o Strategic Claims Services  
 600 N Jackson St - Suite 205  
 Media, PA 19063  
[info@kaiserprivacysettlement.com](mailto:info@kaiserprivacysettlement.com)

*If you would like to unsubscribe from future email communications regarding this case, please click the link below. We are the Notice Administrator for this case and we were provided your information because you were identified as a potential Class Member. Your information will only be used to provide you communications regarding this case and not for any other purpose.*

*Unsubscribing from emails regarding this case does not remove you from the class list and you may still receive communications via regular mail as required by the Court. Unsubscribing from emails is not the same as opting out or excluding yourself from the case. Please refer to the information you received about the case for more information regarding that process.*

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Wednesday, March 11, 2026 at 9:36 AM

I have read the above and would like to unsubscribe from future email communications regarding this case. [click here](#)

3/10/26 4:54 PM Ticket Assigned to Test Agent

Jessica Enck

They state they want to submit a claim and also object to the settlement?

3/11/26 9:35 AM

Test Agent

Good morning,

A paper copy of the Claim Form will be mailed to the address requested. A PDF/printable copy is also attached.

Claims may be submitted by mail (address on form), fax (see below), or email to [info@strategicclaims.net](mailto:info@strategicclaims.net). [For a faster confirmation, if you have your unique ID, a claim can also be submitted using the online claim form, here:](#)

<https://kaiserprivacysettlement.com/online-claim-form/>

Please see the instructions on p. 12 of the attached Notice/Claim Form regarding how to properly object to the terms of the Settlement.

Feel free to contact the office if you have any further questions.

Thank you.

KaiserNoticeClaimCombined.pdf (511.6 kb)

# EXHIBIT I

## Cornelia Vieira

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**From:** Katie Dolan  
**Sent:** Thursday, March 12, 2026 9:10 AM  
**To:** Cornelia Vieira  
**Subject:** FW: Kaiser Privacy Breach ([REDACTED])

Please see further response from [REDACTED].  
Please let me know how I should answer.

Thank you,



### Katie Dolan

Assistant Project Manager

**O:** 866.274.4004

**E:** <Kdolan@Strategicclaims.net>

600 North Jackson Street, Suite 205  
Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

---

**From:** [REDACTED]  
**Sent:** Wednesday, March 11, 2026 11:52 PM  
**To:** Katie Dolan <kdolan@strategicclaims.net>  
**Subject:** Re: Kaiser Privacy Breach ([REDACTED])

Katie,

I made several phone calls in an attempt to retain a lawyer, but I was unable to do so, in an adequate timeframe. I am not confident in submitting an object without adequate legal advice.

I am simply requesting that the court be made aware of my previously submitted settlement request.  
Class Counsel may have already done so.

I understand that the judge may find my claim request without merit.

[REDACTED]

class member ID [REDACTED]

On Wednesday, March 11, 2026 at 06:58:55 AM PDT, Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

Good morning,

Please be advised I am unable to provide any advice/information on a settlement aside from this one.

Regarding this Settlement and your options, please refer to the Notice which is attached here.

Thank you,  
Katie



**Katie Dolan**

Assistant Project Manager

O: 866.274.4004

E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>

600 North Jackson Street, Suite 205

Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

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**From:** [REDACTED]  
**Sent:** Tuesday, March 10, 2026 11:29 PM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Kaiser Privacy Breach ([REDACTED])

Katie,

When I read the notice instructions, I am not confident that an objection is appropriate.

I see that there is a fairness hearing. Can I make the court aware of my request to make changes that will protect my privacy, rather than a monetary settlement, at the hearing?

Or

Is speaking at the fairness hearing only for the purpose of making an objection?

[REDACTED]

On Mar 10, 2026, at 8:21 AM, Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

Good morning,

Please read and follow the instructions in the Notice.

Thank you,



**Katie Dolan**

Assistant Project Manager

O: 866.274.4004

E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>

600 North Jackson Street, Suite 205

Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

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**From:** [REDACTED]  
**Sent:** Sunday, March 8, 2026 10:31 PM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Kaiser Privacy Breach ([REDACTED])

Katie,

I have drafted an objection.

Should I provide a copy to you?

[REDACTED]

On Mar 6, 2026, at 1:55 PM, Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

[REDACTED],

Objections to the Court have to be submitted in the manner described in the Notice. We are unable to provide any information on any objection that may have been filed with the court.

Thank you,



**Katie Dolan**

Assistant Project Manager

O: 866.274.4004  
E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>  
600 North Jackson Street, Suite 205  
Media, PA 19063  
[strategicclaims.net](http://strategicclaims.net)

---

**From:** [REDACTED]  
**Sent:** Friday, March 6, 2026 3:53 PM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Re: Kaiser Privacy Breach ([REDACTED])

Katie,  
The instructions (pages 12-13) for an objection indicate that it should be delivered directly to the court, can it be emailed? If so to what email address?

Do you know if any other objections have been filed?

[REDACTED]

Note:

\* The \$20-\$40 noted does not even compensate for the time involved with reading the documents.

\*\* I have reached out to several attorneys but have been unsuccessful in obtaining assistance with my objection, so it seems that I will need to make my best effort, unless the settlement attorneys can help?

On Thursday, March 5, 2026 at 10:05:27 AM PST, Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

Good afternoon,

I just left you a voicemail. Please give me a call back when you can.

Thank you,

<image002.png>

**Katie Dolan**

Assistant Project Manager

O: 866.274.4004

E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>

600 North Jackson Street, Suite 205

Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

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**From:** [REDACTED]  
**Sent:** Wednesday, March 4, 2026 3:44 PM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Re: Kaiser Privacy Breach ([REDACTED])

Katie,  
Has the (or will) the court be made aware of my request or should I mail notice to them?  
The deadline is next week.

Also, your last email provided a claim form. Can I add my request to the claim form or is the provided form for a standard settlement only?

[REDACTED]

On Wednesday, March 4, 2026 at 11:41:45 AM PST, Katie Dolan  
<[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

Thank you for your email.  
Please note your original request was forwarded to class counsel, and upon their request also to defendant's counsel, so they would be able to get back to you directly. We have also informed defendant's counsel that you have inquired again today.

We have not received any further information from counsel to his specific request, and are unable to provide any guidance outside of the terms of the settlement.

If you would like to file a claim to participate in this settlement, please feel free to do so online at [www.kaiserprivacysettlement.com](http://www.kaiserprivacysettlement.com), and utilizing your unique class member ID

[REDACTED].

Sincerely,

Administrator



**Katie Dolan**

Assistant Project Manager

O: 866.274.4004

E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>

600 North Jackson Street, Suite 205

Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

---

**From:** [REDACTED]  
**Sent:** Wednesday, March 4, 2026 11:28 AM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Re: Kaiser Privacy Breach ([REDACTED])

Good morning Katie,  
I am writing to check status of my settlement request. I see that it needs to be submitted next

week. Will the attorney's assist with submitting my request?

[REDACTED]  
[REDACTED]

Note:

I see that the upcoming Fairness Hearing is at the Phillip Burton Federal Building. I previously worked in commercial construction (testing H.V.A.C. systems) The Phillip Burton Federal Building was one of my projects in the late 1990's.

On Thursday, February 26, 2026 at 07:24:37 AM PST, Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)> wrote:

Good morning [REDACTED],

We have forwarded your request to Class Counsel for review.

Thank you,  
Katie

<image002.png>

**Katie Dolan**

Assistant Project Manager

O: 866.274.4004

E: <[Kdolan@Strategicclaims.net](mailto:Kdolan@Strategicclaims.net)>

600 North Jackson Street, Suite 205

Media, PA 19063

[strategicclaims.net](http://strategicclaims.net)

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**From:** [REDACTED]  
**Sent:** Monday, February 23, 2026 4:52 PM  
**To:** Katie Dolan <[kdolan@strategicclaims.net](mailto:kdolan@strategicclaims.net)>  
**Subject:** Kaiser Privacy Breach ([REDACTED])

Katie D.  
(We spoke on phone today)

**I would like to request as part of the settlement that any and all counseling information be removed or redacted (blocked out) from my electronic medical record.** I am requesting this due to the Data Leak, dramatic changes in the privacy agreement (after information was given / prior to the electronic system), out of context information and errors. This information has legal implications, can affect family relationships, can affect future employment, etc... Kaiser has a vast amount of employees (including friends and relatives of relatives) now we also have a data leak!

We would like confirmation that this request has been submitted to the court or assistance with next steps to assure that it is submitted to the court.

This has been an ongoing issue with Kaiser and it is important to us. If it is not possible to remove or redact (block out) our counseling information, then we would request a greatly increased settlement.

Sincerely,

██████████

Note: This email is confidential

***IMPORTANT:*** *The information contained in this message is confidential and is intended only for the named addressee(s). If the reader of this message is not an intended recipient (or the individual responsible for the delivery of this message to an intended recipient), please be advised that any re-use, dissemination, distribution or copying of this message is prohibited. If you have received this message in error, please reply to the sender that you have received the message in error and then delete it. Thank you SCS*

# EXHIBIT J

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, March 13, 2026 at 10:51 AM

## Ticket #296054

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	3/13/26 12:07 AM	<b>Source</b>	Email
<b>Assigned To</b>	Leo Lysakowski	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	3/13/26 10:47 AM
<b>Due Date</b>	3/14/26 12:07 AM	<b>Last Message</b>	3/13/26 12:07 AM

### Ticket Details

<b>Case:</b>	Kaiser
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## Kaiser Contact Form Contact Form - I have a question about the case

3/13/26 12:07 AM Kaiser Contact Form Contact Form - I have a question about the case	Kaiser Website

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, March 13, 2026 at 10:51 AM

**First and Last Name**

[REDACTED]

**Email**

[REDACTED]

**Phone**

[REDACTED]

**Settlement Class Member Unique ID**

[REDACTED]

**Reason for Contact**

I have a question about the case

**Your Question**

Hi

I want to clarify if estimate amount of settlement is really only between \$20-40 as my situation due to the medical breach done by my ex spouse caused a lot of trouble regarding custody trials for a couple years and will have a couple trial next weeks. I rather want to request or sue for claim later as I didn't have enough time to find proper legal team to represent me for this settlement. Also, online form for opt out or claim forms are allowing to type ID number or any at all. Please fix the site. At this moment I will submit hard copy I had in case for claim form so I get something and to object during the hearing or upcoming trial cases. Would I be able to do that if I don't agree with the settlement amount?

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Friday, March 13, 2026 at 10:51 AM

3/13/26 10:47 AM

Leo Lysakowski

Good morning,

Thank you for contacting us regarding the *Kaiser Privacy Breach Settlement*.

Any objection to the proposed Settlement or any aspect thereof must be in writing and submitted to the Court, and you must follow the instructions in the Notice on how to object. Please see detailed information on p. 12 of the attached Notice/Claim Form.

Please be advised the deadline to opt out was 3/12/2026.

Feel free to contact the office if you have any further questions.

Thank you.

KaiserNoticeClaimCombined.pdf (511.6 kb)

# EXHIBIT K

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Tuesday, March 10, 2026 at 10:41 AM

## Ticket #413716

<b>Status</b>	Completed	<b>Name</b>	[REDACTED]
<b>Priority</b>	Normal	<b>Email</b>	[REDACTED]
<b>Department</b>	Claims Administrators	<b>Phone</b>	[REDACTED]
<b>Create Date</b>	1/27/26 4:53 AM	<b>Source</b>	Email
<b>Assigned To</b>	Test Agent	<b>Help Topic</b>	Claims
<b>SLA Plan</b>	Default SLA	<b>Last Response</b>	3/10/26 10:41 AM
<b>Due Date</b>	1/28/26 4:53 AM	<b>Last Message</b>	1/27/26 4:53 AM

### Ticket Details

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<b>Case:</b>	Kaiser
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## Formal Objection to Settlement Valuation and Notice of Potential Individual Legal Action

# SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Tuesday, March 10, 2026 at 10:41 AM

1/27/26 4:53 AM Formal Objection to Settlement Valuation and Notice of Potential Individual Legal Action T D

Greetings,

My name is [REDACTED], a resident of [REDACTED]. I am one of approximately 25 family members included in this class action settlement. My daughter and I were insured by Kaiser Permanente for more than 20 years and entrusted Kaiser with highly sensitive personal and medical information.

As a direct result of this data breach, my confidential information was exposed, including my mental health records, Social Security number, and date of birth. This exposure led to my being doxed, targeted by online harassment, and subjected to identity theft. Multiple fraudulent loan attempts have been made using my name and Social Security number. These events are not speculative—they are documented and ongoing.

I suffer from anxiety and depression, conditions that were disclosed without my consent due to this breach. The unauthorized exposure of my mental health history has caused severe emotional distress, reputational harm, and lasting fear regarding who in my community has access to my private medical information. The breach has materially and irreversibly impacted my quality of life, personal security, and mental well-being, as well as that of my daughter.

I formally object to the proposed settlement valuation of \$20 as grossly inadequate and unreasonable given the scope of harm, the sensitivity of the data compromised, and the real-world damages I have suffered. This amount does not begin to compensate for identity theft, emotional distress, loss of privacy, or the ongoing risk of future misuse of my personal information.

Please advise, in writing, whether withdrawing from this settlement preserves my right to pursue an individual claim through private counsel. I am actively evaluating all legal options, including individual litigation, to seek appropriate compensation for damages caused by Kaiser Permanente’s failure to safeguard my protected information.

I expect a prompt response addressing these concerns.

Sincerely,

[REDACTED]

3/10/26 9:33 AM Ticket Assigned to Test Agent McKenna Quirk

Opt-out?

**SUPPORT CENTER**  
Support Ticket System

Strategic Claims Services, Inc. Tuesday, March 10, 2026 at 10:41 AM

3/10/26 10:41 AM

Test Agent

Good morning,

Thank you for contacting us regarding the *Kaiser Privacy Breach Settlement*.

Please see detailed information about *objecting* to the Settlement on p. 12 of the attached Notice/Claim Form.

To properly *exclude* yourself from the litigation, you must complete and submit an opt-out form. The online opt-out form is available here:

<https://kaiserprivacysettlement.com/online-opt-out-form/>

You may otherwise feel free to complete and submit the attached opt-out form by mail, fax, or email.

Feel free to contact the office if you have any further questions.

Thank you.

KaiserNoticeClaimCombined.pdf (511.6 kb)

Kaiser Opt-Out Form.pdf (62.5 kb)