

Notice of Class Action Settlement

What is this Settlement for?

Plaintiffs filed a class action lawsuit and claimed that San Diego Fertility Center Medical Group, Inc. and Ivy Fertility Services, LLC (individually, “Ivy,” and collectively “Defendants”) violated their Privacy Policies and the law by allegedly sharing personally identifiable device information of persons who used their websites after January 1, 2020. Defendants deny these allegations and any assertion of wrongdoing including any violation of its Privacy Policies.

Plaintiffs and Defendants agreed to settle the Lawsuit in mediation. By this agreement, the parties avoid the cost and uncertainty of further litigation, trial, and appeals. Counsel for Defendants and Plaintiffs negotiated the terms of the settlement described in this notice.

Defendants deny that San Diego Fertility Center Medical Group, Inc. or Ivy Fertility Services, LLC, or any individual or party affiliated with them, shared any patient records or personal medical information, names, birthdays, email addresses, or physical addresses.

What Are The Settlement Class Member Benefits?

Defendants have agreed to pay \$850,000 into a Settlement Fund. The Settlement Administrator will distribute pro rata cash payments to Settlement Class Members who submit a valid and timely Claim Form.

Deadline to make my claim:

You must complete the claim form (see next section) by Tuesday, June 24, 2025.

How do I make a claim to receive payment?

You will need to complete an on-line claim form. In the claim form, you will be asked to certify that you visited one of the following urls between January 1, 2020 and April 4, 2025:

- <https://www.sdfertility.com>
- <https://app.ivyfertility.com/contact-us/sdfc/scheduleconsultation>
- <https://fertilitycentersoc.com/iui.html>
- <https://www.reproductivepartners.com>
- <https://pnwfertility.com/>
- <https://www.fertilitymemphis.com/>
- <https://www.idahofertility.com/>
- <https://nevadafertility.com/>
- <https://www.nvfertility.com/>
- <https://utahfertility.com/>

- <https://www.ivyfertility.com/>
- <https://www.vafertility.com>
- Other website created, owned, maintained, or distributed by Defendants

Claim form available at: www.SDFCIVYPixelSettlement.com

Copy of Complete Settlement Agreement:

For a copy of the complete settlement agreement, go to www.SDFCIVYPixelSettlement.com

Do I have to Participate?

No. If you do not want to participate in this settlement, you are not required. If you would like to opt-out of this agreement and pursue this claim on our own with your own legal counsel, you can. To do so, you must “opt-out” by Tuesday, June 24, 2025. If you would like to opt out, fill out an opt-out form here: www.SDFCIVYPixelSettlement.com

Can I object to this Settlement?

Yes. If you would like to object to this settlement, you have until Tuesday, June 24, 2025 to file your objection. If you would like to object to this settlement, you may fill out an objection form here: www.SDFCIVYPixelSettlement.com

Questions About this Notice?

To reach the Settlement Administrator, call 1-844-638-4918. For detailed information about this Settlement, please visit www.SDFCIVYPixelSettlement.com.

Plaintiffs and class members are represented by Almeida Law Group, Cohen & Malad, LLP, Srourian Law Firm, P.C., Stranch, Jennings, & Garvey, PLLC, and Strauss Borelli, PLLC.