

CIRCUIT COURT FOR SANGAMON COUNTY, SEVENTH JUDICIAL CIRCUIT
Brand, et al. v. The University of Phoenix, Inc., Case No. 2026LA000170

**You May Be
Entitled to a Payment From a Class Action Settlement.**

A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit claiming that Defendant, The University of Phoenix, Inc., disclosed its students' personally identifiable information ("PII") to Meta Platforms, Inc. and other third parties without consent in violation of the Video Privacy Protection Act, 18 U.S.C. § 2710, *et seq.*, the Electronic Communications and Privacy Act, 18 U.S.C. § 2510, *et seq.*, and the Illinois Eavesdropping Act, 720 Ill. Comp. Stat. 5/14-1, *et seq.* Defendant denies that it violated any law but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.
- You are included if you were enrolled at The University of Phoenix at any time from April 1, 2023 to October 6, 2026 or, if located in Illinois, you were enrolled at The University of Phoenix at any time from April 1, 2020 to October 6, 2026.
- If approved by the Court, Defendant will pay \$25.00 to all valid claimants (subject to *pro rata* reduction should the Gross Maximum Funding amount of \$8,750,000.00 be reached). Defendant has agreed to pay all approved claims to the Settlement Class, together with notice and administrative expenses, approved attorneys' fees and costs to Class Counsel, and a service award to each of the Class Representatives. Additionally, Defendant agrees that it will provide notice to individuals in the United States who enroll at The University of Phoenix on the website (www.phoenix.edu) that the website uses cookies and similar tools via a banner and through Defendant's privacy policy.
- Read this notice carefully. Your legal rights are affected whether you act or don't act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY NOVEMBER 5, 2026	This is the only way to receive a cash payment.
EXCLUDE YOURSELF BY NOVEMBER 5, 2026	You will receive no cash payment, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT AND REQUEST TO SPEAK AT THE HEARING BY NOVEMBER 5, 2026	Write to the Court explaining why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing.

DO NOTHING

You won't get a share of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this case.

Your rights and options—and the deadlines to exercise them—are explained in this Notice.

BASIC INFORMATION**1. Why was this Notice issued?**

A Court authorized this notice because you have a right to know about a proposed settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the settlement. This Notice explains the lawsuit, the settlement, and your legal rights.

The Honorable Gail L. Noll, of the Circuit Court for Sangamon County, Illinois, Seventh Judicial Circuit is overseeing this case. The case is called *Brand, et al. v. The University of Phoenix, Inc.*, Case No. 2026LA000170. The people who sued are called the Plaintiffs. The Defendant is The University of Phoenix, Inc.

2. What is a class action?

In a class action, one or more people called the class representatives (in this case, Lauren Brand and Janielle Dawson) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

3. What is this lawsuit about?

This lawsuit claims that Defendant violated the Video Privacy Protection Act, 18 U.S.C. § 2710, *et seq.*, the Electronic Communications and Privacy Act, 18 U.S.C. § 2510, *et seq.*, and the Illinois Eavesdropping Act, 720 Ill. Comp. Stat. 5/14-1, *et seq.* by disclosing its students' personally identifiable information (“PII”) to Meta Platforms, Inc. and other third parties without consent. Defendant denies that it violated any law but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiffs or the Defendant should win this case. Instead, both sides agreed to a settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Class Members will get compensation sooner rather than, if at all, after the completion of a trial.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The **Settlement Class** is defined as:

all individuals in the United States who were enrolled at The University of Phoenix from April 1, 2023 to and through the date on which class notice is disseminated, as well as all individuals in Illinois who were enrolled at The University of Phoenix from April 1, 2020 to and through the date on which class notice is disseminated.

Excluded from the Class is any entity in which Defendant has a controlling interest, officers or directors of Defendant, and the judge presiding over this action as well as his or her immediate family members.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Defendant has agreed to pay \$25.00 for all approved claims to the Settlement Class (subject to *pro rata* reduction should the Gross Maximum Funding amount of \$8,750,000.00 be reached), together with notice and administrative expenses, approved attorneys' fees and costs to Class Counsel, and a service award to each of the Class Representatives. Additionally, Defendant agrees that it will provide notice to individuals in the United States who enroll at The University of Phoenix on the website that the website uses cookies and similar tools via a banner and through Defendant's privacy policy.

A detailed description of the settlement benefits can be found in the [Settlement Agreement](#).

7. How much will my payment be?

If you are member of the Settlement Class, you may submit a Claim Form to receive a Cash Payment of \$25.00 (subject to *pro rata* reduction should the Gross Maximum Funding amount of \$8,750,000.00 be reached). **You must submit a Claim Form** in order to receive any compensation under the Settlement.

You must provide proof of your Settlement Class membership when filing a claim by providing the unique Login ID and PIN on the notice you received by e-mail. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please email the Settlement Administrator at info@UOPPixelSettlement.com to request your Login ID and PIN.

8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for **November 20, 2026**. If the Court approves the settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will receive their cash payment approximately 100 days after the settlement has been finally approved and/or any appeals process is complete. Payment by check will be the default payment method, or you can choose to receive a payment by Zelle, Venmo, PayPal or other similar electronic payment method offered by the Settlement Administrator.

HOW TO GET BENEFITS

9. How do I get a payment?

If you are a Settlement Class Member and you want to get a cash payment, you **must** complete and submit a Claim Form by **November 5, 2026**. Claim Forms can be found and submitted online at www.UOPPixelSettlement.com, or by printing and mailing a paper Claim Form, copies of which are available for download at the settlement website.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Class?

If the settlement becomes final, you will give up your right to sue Defendant for the claims this settlement resolves. The Settlement Agreement describes the specific claims you are giving up against the Defendant. You will be “releasing” the Defendant and certain of its affiliates described in Paragraph 1.25 of the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are “releasing” the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the “Court Documents” link on the website.

The Settlement Agreement describes the released claims with specific descriptions (*see* Paragraphs 1.25-1.27 and 3.1-3.2 of the Settlement Agreement), so read it carefully. If you have any questions you can talk to the lawyers listed in Question 12 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

11. What happens if I do nothing at all?

If you do nothing, you won’t get any benefits from this settlement. But, unless you exclude yourself, you won’t be able to start a lawsuit or be part of any other lawsuit against the Defendant for the claims being resolved by this settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed Joshua D. Arisohn of Arisohn LLC and Scott R. Drury of Drury Legal, LLC to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

13. How will the lawyers be paid?

Class Counsel’s attorneys’ fees, costs, and expenses will be paid from the Gross Settlement Amount in an amount determined and awarded by the Court. Class Counsel will seek no more than 35% of the Gross Maximum Funding amount (currently set at \$8,750,000.00), but the Court may award less than this amount.

As approved by the Court, Defendant will pay the Class Representatives service awards. The Class Representatives will seek no more than \$5,000.00 each as service awards, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that **you want to be excluded** from the *Brand, et al. v. The University of Phoenix, Inc.*, Case No. 2026LA000170 settlement. Your letter or request for exclusion must also include your name, your address, your signature, the name and number of this case, and a statement that you wish to be excluded. You must mail or deliver your exclusion request no later than **November 5, 2026** to:

University of Phoenix Pixel Settlement
ATTN: Exclusion Requests
P.O. Box 25191
Santa Ana, CA 92799

15. If I don’t exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, do not submit a Claim Form to ask for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

If you're a Settlement Class Member, you can object to the settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file with the Court a letter or brief stating that you object to the Settlement in *Brand, et al. v. The University of Phoenix, Inc.*, Case No. 2026LA000170 and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, an explanation of the basis upon which you claim to be a Settlement Class Member, the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Defendant's Counsel listed below.

If you want to appear and speak at the Final Approval Hearing to object to the settlement, with or without a lawyer (explained below in answer to Question Number 21), you must say so in your letter or brief. You must file the objection with the Court no later than **November 5, 2026** and mail copies of your objection to both Class Counsel and Defendant's counsel:

Court	Class Counsel	Defendant's Counsel
The Hon. Gail L. Noll Circuit Court Sangamon County 200 South 9th Street Springfield, IL 62701	Joshua D. Arisohn Arisohn LLC 94 Blakeslee Rd. Litchfield, CT 06759 Scott R. Drury Drury Legal, LLC 6 Carriage Lane Highwood, IL 60040	Joel C. Griswold Baker & Hostetler LLP One North Wacker Drive Suite 3700 Chicago, IL 60606-2859

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing at **9:30 a.m. on November 20, 2026**, virtually via Zoom (Meeting ID: 269 739 8957; password 903784). The purpose of the hearing will be for the Court to determine whether to approve the settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider Class Counsel's request for attorneys' fees and expenses; and to consider the request for a service award to each of the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check the website, www.UOPPixelSettlement.com or call Class Counsel at 917-656-0569. If, however, you timely objected to the settlement and advised the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of such Final Approval Hearing.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include in your letter or brief objecting to the settlement a statement saying that it is your "Notice of Intent to Appear in *Brand, et al. v. The University of Phoenix, Inc.*, Case No. 2026LA000170." It must include your name, address, telephone number, and signature, as well as the name and address of your lawyer if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than **November 5, 2026**.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.UOPPixelSettlement.com. You may also write with questions to University of Phoenix Pixel Settlement c/o Settlement Administrator, P.O. Box 25191, Santa Ana, CA 92799. You can call the Settlement Administrator at 1-866-675-2696 or Class Counsel, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the case website.



For complete information and to file a claim, scan this QR code to go directly to the Settlement website, **www.UOPPixelSettlement.com**