

Exhibit C

Email Notice

TO: <<Class Member Email>>
FROM: Settlement Administrator <<Settlement@xxxxxxxxxxxx.com>>
RE: Legal Notice of Class Action Settlement

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Adams v. America's Test Kitchen, LP, et al., Case No. 1:22-cv-11309 (AK)
(United States District Court for the District of Massachusetts)

Our Records Indicate You May Have Been a Subscriber of America's Test Kitchen during the Period of July 13, 2020 through [insert date] Who Requested or Obtained a Video on America's Test Kitchen's Website While Being a Facebook Account Holder

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

This notice is to inform you that a settlement has been reached in a class action lawsuit claiming that Defendants America's Test Kitchen, LP *et al.* (collectively "America's Test Kitchen" or "ATK"), disclosed its subscribers' personally identifiable information to Facebook via the Meta Pixel, without its subscribers' consent, in violation of the Video Privacy Protection Act (the "VPPA"). Personally identifiable information includes information which identifies a person as having requested or obtained specific video materials or services from a video tape service provider. ATK denies that it violated any law but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Am I a Settlement Class Member? Our records indicate you may be a Settlement Class Member. Settlement Class Members are all individuals residing in the United States who, from July 13, 2020, to and through [Preliminary Approval Date], were Facebook account holders and subscribers to Defendants' digital services, and who requested or obtained any videos on any America's Test Kitchen website while an active Facebook account holder.

How Does the Settlement Affect Me? The Settlement enjoins and requires ATK (1) to remove the Meta Pixel from any page on its websites (including www.americastestkitchen.com) accessible in the United States that includes video content, and (2) to not possess or retain PII of Settlement Class Members generated by Meta Pixels.

Plaintiff may seek from the Court an injunction to enforce the above terms of this Agreement. ATK may seek relief from this injunction upon amendment or repeal of the VPPA or upon implementation of a VPPA-compliant consumer consent form.

If approved by the Court, the Settlement will affect your right to seek certain injunctive or non-monetary equitable relief against ATK. The Settlement will not affect your right, if any, to seek damages or other monetary relief from ATK.

Because Settlement Class Members do not release claims for monetary damages and because ATK is only agreeing to remedial and injunctive relief (i.e., business practice changes), Settlement Class Members cannot opt out of the Settlement. This means that all members of the Settlement Class will be bound by the Settlement, if the Court approves it.

Release. If the Settlement is approved, Settlement class members will be deemed to have

released ATK from and for any and all *non-monetary* claims, liabilities, rights, demands, suits, matters, obligations, actions, or causes of action that they have or could have asserted against ATK regarding the alleged disclosure of their personally identifiable information and video viewing behavior to a third party. You will not be deemed to have released any claims for monetary relief.

Your Right to Object. As a member of the Settlement Class, you have the right to object to the Settlement if you don't like any part of it, including Class Counsel's request for attorney's fees and expenses and/or the request for a service award for the Class Representative. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement, though it may modify the amount of attorneys' fees and expenses requested. To be valid, your objection must be in writing, made only to the Court, and must be filed or postmarked by [insert date]. If you file a timely written objection, you may, but are not required to, appear at the final approval hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must: (a) clearly identify the case name and number: *Adams v. America's Test Kitchen, LP, et al.*, Case No. 1:22-cv-11309 (AK) (D. Mass.), (b) include the basis for the objection, and (c) be filed or postmarked on or before [insert date]. If you do not submit a timely written objection you will not be able to participate in the final approval hearing.

Who Represents Me? The Court has appointed lawyers Hank Bates, Tiffany Oldham, Lee Lowther, and Courtney Ross, of Carney Bates & Pulliam PLLC, 519 W. 7th Street, Little Rock, AR 72201 to represent the Settlement Class. They are called Class Counsel. 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.

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at [] on [date] in Courtroom 8 at the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210. 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 the Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award to the Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

How Do I Get More Information? For more information, including the full Notice and Settlement Agreement go to [here](#), contact the Settlement Administrator at [1-800-000-000](tel:1-800-000-000) or ATK VPPA Settlement Administrator, [\[Address\]](#) or call Class Counsel at 1-888-551-9944.