Exhibit D

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Southern District of Florida
M.H., et al. v. Comprehensive Breast Care Center of Texas, Inc., No. 26-cv-61032

If you scheduled or rescheduled an appointment through Solis Mammography's website from December 14, 2023 to November 4, 2026, you may be eligible for benefits from a class action settlement. The lawsuit alleges that information about these appointments was disclosed to third parties, such as Google. Solis denies these allegations.

A federal Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Comprehensive Breast Care Center of Texas, Inc. d/b/a Solis Mammography ("Solis" or "Defendant") in a class action lawsuit. The Action alleges that the Defendant disclosed patients' protected health information ("PHI") and/or tracking data without their consent to third parties, including Google, via web analytics technologies used on the Defendant's Website, https://www.solismammo.com. Plaintiffs allege these disclosures violated state and federal law. The Defendant denies all allegations of wrongdoing and liability, and the Court has not found that the Defendant did anything wrong.
- The Settlement Class consists of all individuals residing in the United States who scheduled or rescheduled an appointment through the Defendant's Website, https://www.solismammo.com/, from December 14, 2023 to November 4, 2026.
- Under the proposed Settlement, the Defendant will pay, or cause to be paid, $3,000,000 into a non-reversionary Settlement Fund to resolve the Action. The Settlement Fund will be used to provide *pro rata* (proportional) cash payments ("Settlement Payments") to Settlement Class Members who submit a valid Claim Form as well as pay for Administrative Expenses, Taxes, any attorneys' Fee and Expense Award to Class Counsel, and any Service Awards to the Class Representatives.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive a Settlement Payment is to submit a valid Claim Form.	**Month XX, 202X**
EXCLUDE YOURSELF FROM THE SETTLEMENT	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendant about the claims resolved by this Settlement. You will not receive a Settlement Payment.	**Month XX, 202X**
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you can still submit a Claim Form for a Settlement Payment.	**Month XX, 202X**
DO NOTHING	If you do nothing, you will not get a Settlement Payment and you give up the right to sue the Defendant about the claims resolved by this Settlement.	**No deadline**

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.

- The Court in charge of this case still must decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

Basic Information 3
1. Why was this Notice issued? 3
2. What is this Action about? 3
3. What is a class action? 3
4. Why is there a Settlement? 3

Who is in the Settlement? 3
5. Who is included in the Settlement? 3
6. Are there exceptions to being included? 4

The Settlement Benefits 4
7. What does the Settlement provide? 4
8. What claims am I releasing if I stay in the Settlement? 4

How to get Settlement Benefits – Making a Claim 4
9. How do I submit a Claim Form to get a Settlement Payment? 4
10. When will I get a Settlement Payment? 4

The Lawyers Representing You 5
11. Do I have a lawyer in this case? 5
12. Should I get my own lawyer? 5
13. How will the lawyers be paid? 5

Excluding Yourself From the Settlement 5
14. How do I opt out of the Settlement? 5

Objecting to the Settlement 5
15. How do I tell the Court if I do not like the Settlement? 5
16. What is the difference between objecting and opting out? 6

The Court's Final Fairness Hearing 6
17. When is the Court's Final Fairness Hearing? 6
18. Do I have to come to the Final Fairness Hearing? 6

If You Do Nothing 7
19. What happens if I do nothing at all? 7

Getting More Information 7
20. How do I get more information? 7

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all of your options before the Court decides whether to enter a Final Approval Order and Judgment approving the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *M.H., et al. v. Comprehensive Breast Care Center of Texas, Inc.,* No. 26-cv-61032, pending in the United States District Court for the Southern District of Florida. The people who filed this Action are called the "Plaintiffs" and the company they sued, Comprehensive Breast Care Center of Texas, Inc. d/b/a Solis Mammography ("Solis"), is called the "Defendant."

2. What is this Action about?

The Action alleges that the Defendant disclosed patients' protected health information ("PHI") and/or tracking data without their consent to third parties, including Google, via web analytics technologies used on the Defendant's Website, https://www.solismammo.com. Plaintiffs allege the information was transmitted when individuals scheduled or rescheduled appointments.

Plaintiffs allege claims of common law invasion of privacy, negligence, breach of implied contract, and unjust enrichment and that these disclosures violated state and federal law, including the Electronic Communications Privacy Act, 18 U.S.C. § 2511(1), *et seq.*, and the Florida Security of Communications Act, Fla. Stat. § 934.01, *et seq.* The Defendant denies all of the Plaintiffs' claims and denies all allegations of wrongdoing and liability.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people who they allege have similar claims. These individuals who sue are known as "Class Representatives" or Plaintiffs. Together, after a court grants certification for settlement purposes, the people included in the class action are called a "Settlement Class" or "Settlement Class Members." One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called "opting out") from a settlement. In this Settlement, the Class Representatives are M.H., M.R., and S.M.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Defendant. The Defendant denies all claims and contends that it has not violated any laws. The Plaintiffs and Defendant agreed to a Settlement to avoid the costs and risks of further litigation, and through the Settlement, Settlement Class Members are eligible to claim a cash payment. The Settlement is not an admission of liability or wrongdoing by the Defendant. The Plaintiffs and their attorney, who also represents Settlement Class Members as "Class Counsel," believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all individuals residing in the United States who scheduled or rescheduled an appointment through the Website, https://www.solismammo.com/, from December 14, 2023 to November 4, 2026.

6. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are: (1) the judges presiding over the Action and members of their families; (2) Solis and its officers and directors; (3) natural persons who properly execute and submit a Request for Exclusion prior to the expiration of the Opt-Out Date; (4) Plaintiffs' counsel and Defendant's counsel; and (5) the successors or assigns of any such excluded natural person.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Under the proposed Settlement, the Defendant will pay, or cause to be paid, $3,000,000 into a Settlement Fund to resolve the Action. The Settlement Fund will be used to provide *pro rata* (proportional) cash payments ("Settlement Payments") to Settlement Class Members who submit a valid Claim Form as well as pay for Administrative Expenses, Taxes, any attorneys' Fee and Expense Award to Class Counsel, and any Service Awards to the Class Representatives.

To receive a Settlement Payment, you must submit a Claim Form. After deducting the expenses, taxes, fees, and awards listed above, all Settlement Class Members who submit a timely and valid Claim Form will receive an equal share of the remaining balance of the Settlement Fund. The Settlement Payment amount will be determined based on the total number of valid and timely claims and the remaining funds.

8. What claims am I releasing if I stay in the Settlement?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The Release section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.[website].com.

HOW TO GET SETTLEMENT BENEFITS – MAKING A CLAIM

9. How do I submit a Claim Form to get a Settlement Payment?

You must submit a Claim Form by **Month XX, 2026** to receive a Settlement Payment. Claim Forms must be submitted online at www.[website].com, or mailed to the Settlement Administrator, postmarked by **Month XX, 202X**, at:

Settlement Administrator – XXXXXX
c/o Kroll Settlement Administration LLC
ATTN: Claims
P.O. Box XXXXXX
New York, NY 10150-XXXX

10. When will I get a Settlement Payment?

The short answer is – after the Settlement is "finally approved" and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Fairness Hearing on **Month XX, 202X**, to decide whether to approve the Settlement, Class Counsel's request for the Fee and Expense Award, and the Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Payments will be distributed as soon as possible, if and when the Court approves the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

Yes, the Court appointed Matthew J. Langley of Almeida Law Group LLC to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval).

12. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

Class Counsel will ask the Court to approve a Fee and Expense Award of up to XX% of the Settlement Fund ($XXX), and a Service Award of up to $5,000 to each Class Representative. The Defendant has not agreed to any amount and may oppose these requests. If approved, these amounts will be paid from the Settlement Fund before making payments to Settlement Class Members who submit valid Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class.

To exclude yourself from the Settlement, you must submit a written Request for Exclusion to the Settlement Administrator that includes the following information:

- Your full name, current physical mailing address, and telephone number;
- A statement indicating your intent to request exclusion with the name and number of the case, e.g., "I wish to opt out of the Settlement in *M.H., et al. v. Comprehensive Breast Care Center of Texas, Inc.*, No. 26-cv-61032."; and
- Your handwritten or electronic signature. Each Request for Exclusion must be individually signed; mass, group, or class requests, and requests signed only by counsel or an agent, are invalid.

Your Request for Exclusion must be mailed to the Settlement Administrator at the address below, postmarked by Month XX, 202X, or emailed to [DESIGNATED OPT-OUT EMAIL ADDRESS] and received by Month XX, 202X.

Settlement Administrator - XXXXXX
c/o Kroll Settlement Administration LLC
ATTN: Requests for Exclusion
P.O. Box XXXXXX
New York, NY 10150-XXXX

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Payment, request for the attorneys'

Fee and Expense Award and/or Service Awards for the Class Representatives, Release provided to the Defendant, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

To be considered by the Court, your written objection must include:

- The case name and number, *M.H., et al. v. Comprehensive Breast Care Center of Texas, Inc.*, No. 26-cv-61032;
- Your full name, current physical mailing address, and telephone number;
- A statement indicating whether the objection applies only to you, to a subset of the Settlement Class, or to the entire Settlement Class;
- The specific grounds for the objection and all documents or writings you wish the Court to consider;
- The name(s) of any and all counsel representing you;
- Whether you and/or your counsel will appear at the Final Fairness Hearing;
- A list of all class action settlements to which you or your counsel have objected in the preceding five years; and
- Your personal signature.

Your written objection must be filed with the Court by Month XX, 202X or mailed to the Settlement Administrator, postmarked by Month XX, 202X.

COURT	SETTLEMENT ADMINISTRATOR
Clerk of the Court United States District Court for the Southern District of Florida Courthouse Name Street Address City, FL XXXXX	*Settlement Administrator - XXXXXX* c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box XXXXXX New York, NY 10150-XXXX

16. What is the difference between objecting and opting out?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FINAL FAIRNESS HEARING

17. When is the Court's Final Fairness Hearing?

The Court is scheduled to hold a Final Fairness Hearing on **Month XX, 2027 at XX:X0 x.m. ET**, at the U.S. District Court for the Southern District of Florida, [court name and address], to decide whether to approve the Settlement, Class Counsel's request for a Fee and Expense Award of up to XX% of the Settlement Fund (XXX), and Service Awards of up to $5,000 to each of the Class Representatives. The date and time of this hearing may change without further notice. Please check www.[website].com for updates.

18. Do I have to come to the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an objection, you may come to the Final Fairness Hearing to talk about it, but you do not have to. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Release in the Settlement and will not be eligible to receive a Settlement Payment.

GETTING MORE INFORMATION

20. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.[website].com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by telephone at (XXX) XXX-XXXX, or by mail at:

Settlement Administrator – XXXXXX
c/o Kroll Settlement Administration LLC
P.O. Box XXXX
New York, NY 10150-XXXX