

Exhibit C

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

<p>PRADEEP ARORA, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>HONOLULU STAR-ADVERTISER and OAHU PUBLICATIONS INC., jointly and severally,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 1:23-CV-00480</p> <p>NOTICE OF PROPOSED CLASS ACTION SETTLEMENT</p>
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NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

A court of law has authorized this Notice. This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY, AS IT MAY AFFECT YOUR RIGHTS.

A class action settlement (“Settlement”) has been reached with Oahu Publications Inc. (“Oahu Publications”), affecting all natural persons in the United States that have a Facebook account, are subscribed to Oahu Publication’s *Honolulu Star Advertiser*, and watched one or more videos on the website, www.staradvertiser.com. The Settlement resolves a lawsuit alleging that Oahu Publications used a Facebook Pixel on its website, www.staradvertiser.com, and disclosed subscriber’s personally identifiable information. Oahu Publications denies the allegations in the lawsuit, and the Court has not made a determination regarding Plaintiff’s allegations.

Pursuant to the Settlement, Oahu Publications agrees to implement certain changes to its website, www.staradvertiser.com, to ensure compliance with the Video Privacy Protection Act. That is, Oahu Publications has: (i) removed and/or disabled all Pixels embedded in any webpage on its website, www.staradvertiser.com, that could wrongfully include video content and a URL that identifies a specific video requested or obtained from that website webpage; and, (ii) completed a process to ensure Oahu Publications does not wrongfully possess “personally identifiable information” (as that term is defined in the VPPA) of Settlement class members generated by Pixel. Oahu Publications shall not wrongfully resume operation of the Pixel on any webpage of its websites accessible in the United States that include video content and a URL that identifies the specific video requested or obtained from that website webpage. Notwithstanding

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the above, Oahu Publications may seek relief from this injunction upon amendment or repeal of the VPPA or upon implementation of a VPPA-compliant consumer consent form.

The Settlement does not provide money compensation to the class members. Class Counsel will request that the Court award them reasonable attorneys' fees and expenses as for their obtaining the business practice changes required by the Settlement.

You are not required to take any action. This Notice further explains the litigation, the Settlement, and how you may object to any portion of the Settlement, including Class Counsel's request for attorneys' fees and expenses and/or the request for a service award for the named Plaintiff, if you want.

SETTLEMENT CLASS

Generally, you may be affected by and may be interested in the Settlement if you are a natural person in the United States who has a Facebook account, is subscribed to Oahu Publication's *Honolulu Star Advertiser*, and watched one or more videos on www.staradvertiser.com.

SUMMARY OF LAWSUIT

The class action lawsuit was filed on November 27, 2023, in the United States District Court for the District of Hawaii. Plaintiff Pradeep Arora ("Plaintiff" or "Class Representative") is the named plaintiff and the representative on behalf of all members of the Settlement Class in the lawsuit. Plaintiff alleges that Oahu Publications' website, www.staradvertiser.com, utilized a Facebook Pixel, and that Oahu Publications disclosed the personally identifiable information of subscribers that watched one or more videos on the website. The Court has not made a determination of any wrongdoing by Oahu Publications, which denies the allegations and Plaintiff's claim for violation of the Video Privacy Protection Act. The parties agreed to settle all claims in the Lawsuit to avoid the costs and disruption of litigation.

The precise terms and conditions of the Settlement can be obtained by contacting Class Counsel (see below section, "Contacting Class Counsel"), by accessing the Court docket in this case, for a fee, through Pacer at www.pacer.uscourts.gov.

YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT

If you have a Facebook account, are subscribed to Oahu Publication's *Honolulu Star Advertiser*, and watched one or more videos on the website, www.staradvertiser.com, your rights may be affected by this Settlement. You do not have to take any action to receive the benefits of the Settlement.

If approved by the Court, the Settlement will affect your right to seek injunctive, declaratory and other non-monetary equitable relief against defendant Oahu Publications. The

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Settlement will not affect your right, if any, to seek monetary relief from Oahu Publications. You may obtain copies of the Settlement Agreement and related court filings, including the Attorneys' Fees & Expenses Application, by contacting Class Counsel.

NO OPT-OUTS

Because class members do not release any claims for monetary damages and because Oahu Publications is only agreeing to injunctive relief (i.e., business practice changes), 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 Oahu Publications from and for any and all non-monetary claims, whether known or unknown, which you have or may have in the future, that were alleged or asserted against Oahu Publications in the Lawsuit or that could have been alleged or asserted against Oahu Publications in the Lawsuit. Notwithstanding the foregoing, you will only be deemed to have released claims for declaratory, injunctive, and non-monetary equitable relief. You will not be deemed to have released any claims for monetary relief.

SERVICE AWARDS

Class Counsel will also request that the named Plaintiff in this Lawsuit receive a service award of \$5,000 to recognize the contribution made by Plaintiff by filing suit in the United States District Court for the District of Hawaii against Oahu Publications. Any requests for service awards made to the Court at the preliminary approval stage will be subject to the Court's determination at final approval.

CLASS COUNSEL'S REQUEST FOR REASONABLE ATTORNEYS' FEES AND EXPENSES

The individual plaintiff and the Settlement Class are represented by the following law firm: Coulson P.C. ("Class Counsel"). Class Counsel has designated the following local counsel with the authority to act as attorney of record for all purposes: Dennis W. Potts and Trevor S. Potts of Potts & Potts. Class Counsel will request an award from the Court of reasonable attorneys' fees and reimbursement of their expenses for litigating and resolving this Lawsuit and obtaining the Settlement for the benefit of the Settlement Class members.

The Parties agreed to Oahu Publication's implementation of a new business practice concerning subscribers' personally identifiable information, which is the core benefit of the Settlement, before negotiating the maximum amounts of attorneys' fees and expenses Class Counsel could seek from Oahu Publications subject to Court approval. The Parties further agreed they will accept and not appeal the Court's award of attorneys' fees and expenses.

The Settlement Agreement provides that Class Counsel's request for attorneys' fees and expenses will not exceed \$290,000.

The Parties have asked the Court to assess any requested fees and expenses in a separate attorneys' fees motion after (but on the same day as) considering the motion for final approval and the injunctive relief contained therein. Class Counsel's requests for an award of attorney's fees and expenses will be filed with the Court on or before _____, 2024, and is available by accessing the Court docket in this case, for a fee, through Pacer at www.pacer.uscourts.gov.

FINAL APPROVAL HEARING OF THE SETTLEMENT

The proposed Settlement will not be final unless and until the United States District Court for the District of Hawaii grants final approval. The Court has set a final approval hearing about the proposed Settlement at _____ a.m./p.m., on _____, 2024, before the Honorable Helen Gillmor, to determine whether: (a) the proposed Settlement is fair, reasonable, and adequate; (b) a judgment and order of final approval should be entered by the Court to dismiss the Lawsuit with prejudice; (c) Plaintiff's request for a Service Award to the named Plaintiff be approved; and (d) Class Counsel's fees and expenses application should be approved.

THE DATE OF THE FINAL APPROVAL HEARING IS CURRENTLY SET FOR _____, 2024 AND MAY CHANGE WITHOUT FURTHER NOTICE TO THE CLASS MEMBERS.

HOW TO OBJECT TO THE SETTLEMENT

You can object to the Settlement, including Class Counsel's request for attorney's fees and expenses and/or the request for service awards for the named Plaintiff, by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval of the Settlement, none of the agreed-upon business practice changes in the Settlement will be required to be implemented, and the lawsuit will continue. If you do not want the Court to approve the Settlement, you must object.

Any objection to the proposed Settlement must be in writing and made only to the Court. 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: 1:23-cv-00480, (b) be submitted to the Court either by mailing them to United States District Court Clerk's Office, District of Hawaii 300 Ala Moana Blvd. Rm C-338 Honolulu, HI 96850, or by filing them in-person at any location of the United States District Court for the District of Hawaii, and (c) be filed or postmarked on or before _____, 2024. If you do not submit a timely written objection, or if you do not request participation in the final approval hearing, you will not be able to participate in the final approval hearing.

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CONTACTING CLASS COUNSEL

Class Counsel may be contacted as follows:

Nicholas A. Coulson
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MORE INFORMATION

You may obtain more information by contacting Class Counsel or accessing the Court docket in this case, for a fee, through Pacer at www.pacer.uscourts.gov. **PLEASE DO NOT CONTACT THE DISTRICT COURT OR THE CLERK'S OFFICE WITH QUESTIONS REGARDING THIS NOTICE.**

This Notice is not an expression of any opinion by the Court as to the merits of the lawsuit or as to the fairness of the Settlement. This notice is published to advise you of the pendency of the Lawsuit, the Settlement, and your associated rights.