

## BC/BS SETTLEMENT:

### What is this Settlement about?

This settlement, arising from a class action antitrust lawsuit called *In re: Blue Cross Blue Shield Antitrust Litigation MDL 2406*, N.D. Ala. Master File No. 2:13-cv-20000-RDP (the "Settlement"), was reached on behalf of individuals and companies that purchased or received health insurance provided or administered by a Blue Cross Blue Shield company. Class Representatives ("Plaintiffs") reached a Settlement on October 16, 2020 with the Blue Cross Blue Shield Association ("BCBSA") and Settling Individual Blue Plans. BCBSA and Settling Individual Blue Plans are called "Settling Defendants."

Plaintiffs allege that Settling Defendants violated antitrust laws by entering into an agreement not to compete with each other and to limit competition among themselves in selling health insurance and administrative services for health insurance. Settling Defendants deny all allegations of wrongdoing and assert that their conduct results in lower healthcare costs and greater access to care for their customers. The Court has not decided who is right or wrong. Instead, Plaintiffs and Settling Defendants have agreed to a Settlement to avoid the risk and cost of further litigation.

If approved by the Court, the Settlement will establish a **\$2.67 billion Settlement Fund**. Settling Defendants will also agree to make changes in the way they do business that Plaintiffs believe will increase the opportunities for competition in the market for health insurance.

### Who is included?

The Court certified two Settlement Classes in this case a **Damages Class** and an **Injunctive Relief Class**. For more information about these classes, please refer to the [FAQ 5](#) on the website [www.BCBSsettlement.com](http://www.BCBSsettlement.com).

### How do I participate in the Settlement?

To make a claim and receive a payment, you must file a claim form online or by mail postmarked by **November 5, 2021**. Claims may be submitted online or by mail to:

BlueCross Blue Shield Settlement  
c/o JND Legal Administration  
PO Box 91390  
Seattle, WA 98111

If you select the Alternative Option, you must submit relevant data or records showing a higher contribution percentage. Otherwise, the Default Option will be used. Instructions for submitting your claim are on the [www.BCBSsettlement.com](http://www.BCBSsettlement.com) site.

When required, sufficient documentation shall include an attestation signed under penalty of perjury when other documentation is no longer available.

The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

## our Legal Rights and Options in this Settlement Once Notice Begins

Action & Due Date	Explanation
<b>FILE A CLAIM</b>  <b>(DAMAGES CLASS ONLY)</b>  <b>November 5, 2021 (Submitted Online or Postmarked)</b>	<ul style="list-style-type: none"><li>• File a claim for payment Online or by mail.</li><li>• Be bound by the Settlement.</li><li>• Give up your right to sue or continue to sue Settling Defendants for the claims in this case.</li></ul>
<b>ASK TO BE EXCLUDED ("OPT OUT")</b>  <b>(DAMAGES CLASS ONLY)</b>  <b>July 28, 2021 (Postmarked)</b>	<ul style="list-style-type: none"><li>• Remove yourself from the Class.</li><li>• Receive no payment.</li><li>• Keep your right to sue or continue to sue Settling Defendants for the claims in this case.</li></ul>
<b>OBJECT</b>  <b>July 28, 2021 (Postmarked)</b>	<ul style="list-style-type: none"><li>• Write to the Court about why you do not like the Settlement.</li></ul>
<b>ATTEND THE HEARING</b>  <b>October 20, 2021</b>	<ul style="list-style-type: none"><li>• Ask to speak to the Court about the fairness of the Settlement.</li></ul>
<b>DO NOTHING</b>	<ul style="list-style-type: none"><li>• Receive no payment</li><li>• Be bound by the Settlement.</li><li>• Give up your right to sue or continue to sue Settling Defendants for the claims in this case.</li></ul>

These rights and options—and the deadlines to exercise them—are explained in the Notice. The deadlines may be changed, so please check this website for updates and further details.

## Online Claim Form

You will need your Unique ID contained in the email or on the postcard notice that you received to complete the Online Claim Form.