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IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

6 FOLWEILER CHIROPRACTIC, PS, a
Washington professional services corporation,

7
8 Plaintiff,

9 v.

10 AMERICAN FAMILY INSURANCE
COMPANY and AMERICAN FAMILY
MUTUAL INSURANCE COMPANY,

11 Defendant.
12

No.: 16-2-16112-0 SEA

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**DECLARATION OF JENNIFER M. KEOUGH
REGARDING NOTICE ADMINISTRATION**

16 I, JENNIFER M. KEOUGH, declare and state as follows:

17 1. I am the Chief Executive Officer (“CEO”) at JND Legal Administration (“JND”).
18 JND is a legal administration services provider with its headquarters in Seattle, Washington.
19 JND has extensive experience with all aspects of legal administration and has administered
20 settlements in hundreds of class action cases.

21 2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation
22 (“Action”), as ordered by the Court in its Order Granting Unopposed Motion to Amend
23 Complaint, Certify a Settlement Class, Appoint Class Representative and Class Counsel, and

¹ Capitalized terms used and otherwise not defined in this Declaration shall have the meanings given such terms in the Settlement Agreement.

1 Grant Preliminary Approval of Class Settlement (“Order”). This Declaration is based on my
2 personal knowledge and information provided to me by experienced JND employees and, if
3 called on to do so, I could and would testify competently thereto.

4 **CLASS MEMBER DATA**

5 3. On December 30, 2019, JND received two spreadsheets containing, among other
6 information, the names and addresses of individuals identified as Class Members. The
7 spreadsheets contained contact information and other identifying data for a total of 142,124
8 potential Class Member records.

9 4. Prior to mailing notices, JND analyzed raw data to remove duplicate records.
10 JND identified 138,050 duplicate records, resulting in 4,074 unique Class Member records. JND
11 also updated the Class Member contact information using data from the National Change of
12 Address (“NCOA”) database². The Class Member data was promptly loaded into a database
13 established for this Action.

14 **NOTICE MAILING**

15 5. Pursuant to the Settlement, on January 10, 2020, JND mailed the customized,
16 Court- approved Postcard Notice (“Notice”) via U.S. Postal Service regular mail to 4,074 Class
17 Members. A representative sample of the Notice is attached hereto as **Exhibit A**.

18 6. As of the date of this Declaration, JND tracked 472 Notices that were returned to
19 JND as undeliverable. For the undeliverable Notices, JND conducted advanced address searches
20 and received updated address information for two (2) Class Members. JND re-mailed the Notice
21
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² The NCOA database is the official United States Postal Service (“USPS”) technology product which makes change of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained on the database for 48 months.

1 to the two (2) Class Members. JND will continue to perform advanced address research on
2 undeliverable Notices for the remainder of the claims period.

3 7. As of the date of this Declaration, 3,604 Class Members were mailed a Notice
4 which was not returned as undeliverable, representing 88.5% of total Class Members from
5 the Settlement.

6 **SETTLEMENT WEBSITE**

7 8. On January 10, 2020, JND established a settlement-specific website (“Settlement
8 Website”), www.AmericanFamilyClassActionPIPSettlement.com, which hosts copies of
9 important case documents, including the Long Form Notice; answers to frequently asked
10 questions; and Settlement Administrator contact information for telephone, mail, or e-mail
11 contact. The website also allows Class Members to submit a Claim Form electronically. The
12 Long Form Notice is attached hereto as **Exhibit B**.

13 9. As of the date of this Declaration, the Settlement Website tracked 216 unique
14 users who registered 703 page views.

15 10. JND will continue to update and maintain the Settlement Website for the duration
16 of the administration process.

17 **TOLL-FREE INFORMATION LINE**

18 11. In addition to the website, JND established a case-specific dedicated toll-free
19 number, 1-855-961-0955, for Class Members to call to obtain information regarding the
20 Settlement. The line is available 24 hours a day, seven days a week.

21 12. As of the date of this Declaration, the toll-free number has received 16 calls. JND
22 will continue to maintain the toll-free number throughout the Settlement administration process.

23 **REQUESTS FOR EXCLUSION**

1 13. The Notices informed Class Members that any Class Member who wanted to
2 exclude themselves from the Settlement (“opt-out”) must mail a letter to JND stating that they
3 desire to opt- out of the Settlement or otherwise not participate in the Settlement, postmarked on
4 or before February 10, 2020.

5 14. As of the date of this Declaration, JND has not received any timely opt-out requests.

6 **OBJECTIONS**

7 15. The Notices informed recipients that any Class Member who wished to object to
8 approval of the Settlement could object by submitting a written statement to the Clerk of the
9 Court, Class Counsel and Defendants’ Counsel postmarked on or before February 10, 2020.

10 16. As of the date of this Declaration, JND has not received any objections to the
11 proposed Settlement.

12 **CLAIMS RECEIVED**

13 17. The Notices informed recipients that any Class Member wishing to receive a
14 Settlement payment must complete and sign a Claim Form and submit it to JND, postmarked on
15 or before April 20, 2020 if sent by mail, or received by April 20, 2020 if submitted online.

16 18. As of the date of this Declaration, JND has received 144 Claim Forms (128 Claim
17 Forms submitted electronically, and 16 Claim Forms submitted by mail).

18 19. JND will continue to review and validate claim submissions, and will provide a
19 supplemental declaration with final claim counts prior to final approval.

20 I declare under penalty of perjury pursuant to the laws of the United States of America
21 that the foregoing is true and correct.

22 Executed on February 6, 2020 at Seattle, Washington.

23 
 JENNIFER M. KEOUGH

EXHIBIT A

Folweiler v. American Family Insurance
c/o JND Legal Administration
PO Box 91209
Seattle, WA 98111

If you are a Washington healthcare provider who from July 8, 2012 through December 23, 2019, had your claims for reimbursement of medical expenses reduced by American Family Insurance Company or American Family Mutual Insurance Company based on an explanation code P0041 as set out in the Explanation of Remittance form set to you, a class action settlement may affect you.

**You May Be Entitled to a Payment
from a Class Action Settlement**

Visit
www.AmericanFamilyClassActionPIPSettlement.com
for more information

***PLEASE DO NOT CONTACT THE COURT
WITH QUESTIONS ABOUT THE
SETTLEMENT.***



Postal Service: Please do not mark Barcode

ELECTRONIC SERVICE REQUESTED

<<Printed ID>>
Class Member ID: <<NameNumber>>

<<Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

A proposed state-wide class settlement has been reached in *Folweiler Chiropractic, P.S. v. American Family Insurance Company, et al.*, No. 16-2-16112-0 SEA. In the lawsuit, Plaintiff claims that the use by American Family Insurance Company and American Family Mutual Insurance Company of a medical charge database to reduce provider charges that exceeded the 85th percentile of charges in the database violated Washington law.

You are receiving this notice because our records indicate that you may be a member of a proposed settlement class that consists of Washington healthcare providers who from July 8, 2012 through December 23, 2019 had their PIP or MedPay claims for reimbursement of medical expenses reduced by American Family Insurance Company or American Family Mutual Insurance company based on an explanation code P0041 as set out in the Explanation of Remittance form they received.

Under the terms of the settlement, Defendants have agreed to pay up to \$6 million to resolve this litigation. This figure includes attorneys' fees for class counsel (not to exceed \$2,000,000), expenses, administration costs, and a case contribution award to the named Plaintiff (not to exceed \$10,000 total), and potential payments to the members of the class who submit claims. While the exact payment amount class members may receive will depend on the costs associated with administering the settlement, the parties estimate the class members who submit valid claims will receive up to 140% of the amount by which Defendants' reduced the class member claims.

To receive a payment, you must complete and submit a Claim Form by April 20, 2020. You can exclude yourself from this settlement by February 10, 2020 to give up a payment but keep your right to sue Defendants regarding these claims. You can also object to any part of the settlement by February 10, 2020 if you do not exclude yourself from the settlement. If you do nothing, you will not receive a payment, but you will be bound by the decision of the court and will give up your rights to sue about these claims. Complete information on how to file a claim, exclude yourself, or object, is on the settlement website at www.AmericanFamilyClassActionPIPSettlement.com.

The court is scheduled to hold a Final Approval Hearing at 3:30 pm on February 19, 2020, in Courtroom 847 at 516 3rd Avenue Seattle, Washington 98104, to consider whether the settlement is fair, reasonable, and adequate, any objections, and whether to approve the settlement. You may attend the hearing, but you do not have to. The court may also decide to approve attorneys' fees, costs and a case contribution award for the named plaintiff. The request for these expenses will be posted on the settlement website. If the hearing is rescheduled, the new date and time will be available on the settlement website. This is only a summary. For more information, visit the settlement website or call 1-855-961-0955. **Please do not contact the court.**

EXHIBIT B

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AGREEMENT

FOLWEILER V. AMERICAN FAMILY INSURANCE COMPANY, ET AL.

In the Superior Court of King County, Washington
Case No. 16-2-16112-0 SEA

**READ THIS NOTICE CAREFULLY
YOUR LEGAL RIGHTS MAY BE AFFECTED**

This is NOT a solicitation from a lawyer. A state court authorized this notice.

If you are a Washington healthcare provider who from July 8, 2012 through December 23, 2019, submitted medical bills for payment, under the terms of an insured's Personal Injury Protection or Medical Payments coverage, to American Family Insurance Company or American Family Mutual Insurance Company and had your bills reduced based on an explanation code P0041, as set out in the Explanation of Remittance form you received, a class action settlement may affect you.

SUMMARY

- In the class action lawsuit referenced above, Dr. David Folweiler sued American Family Insurance Company and American Family Mutual Insurance Company (“Defendants”) alleging that, in connection with paying benefits under an insured’s Personal Injury Protection (“PIP”) or Medical Payments (“MedPay”) coverage, Defendants improperly reduced provider charges exceeding the 85th percentile¹ of charges contained in a medical charge database.
- Defendants have denied all of Plaintiff’s allegations and any other wrongdoing.
- After several years of litigation, the parties have agreed to settle the class action. You may be entitled to share in the cash settlement if you were a Washington healthcare provider who from July 8, 2012 through December 23, 2019 submitted medical bills for payment, under the terms of an insured’s Personal Injury Protection or MedPay coverage, to Defendants and had your bills reduced based on an explanation code P0041 (“Reason Code 41”) as set out in the Explanation of Remittance form you received.
- If you are a member of this class, you can submit a claim form to recover the amount of charges that were reduced between July 8, 2012 and December 23, 2019 for explanation Reason Code 41 if you have not already been reimbursed for those charges from another source and the insured’s limits of coverage have not already been exhausted.
- The court in charge of this case has not decided whether to finally approve the settlement; however, the court has preliminarily approved the settlement as fair, adequate and reasonable. Payments will take place if the court approves the settlement and after any appeals are resolved.

¹ Plaintiff initially alleged that charges were reduced to the 80th percentile, but Defendants subsequently disclosed that charges were actually reduced to the 85th percentile.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

Participate in the Settlement

If you wish to receive money from the settlement, you **must** file a claim form by **April 20, 2020**. You can file the claim form on-line at AmericanFamilyClassActionPIPSettlement.com.

Exclude Yourself from the Settlement

If you do not want to receive money from the settlement, but you want to keep your rights to sue Defendants separately, you **must** send a letter requesting exclusion postmarked no later than **February 10, 2020**.

Object to the Settlement

If you wish to object to the settlement, you must file a written objection with the court, and mail copies to Class Counsel and Defendants' Counsel stating your objections. Your letter to the court must be received no later than **February 10, 2020**.

Participate in a Hearing

You may appear in court and be heard at the time of the final approval hearing. If you submit a timely objection to the settlement, you must also indicate in the objection that you wish to appear in court and be heard at the time of the final fairness hearing.

Do Nothing

If you do nothing with respect to this notice, **you will not receive any money but you will still be bound by the terms of the settlement**, including the release of claims described below.

These rights and options, including the deadlines by which to exercise them, are explained in this Notice below.

WHAT THIS NOTICE CONTAINS

Basic Information	4
1. What is this about?	
2. What businesses are involved in this settlement?	
3. Why is this a class action?	
4. Defendants deny wrongdoing.	
Who Is In The Settlement Class	5
5. How do I know if I am a Class Member?	
The Settlement Benefits – What You Get If You Qualify	5
6. What does the settlement provide?	
How To Get A Payment – Submitting a Claim Form	5
7. How do I file a claim?	
8. How much is my payment going to be?	
9. When will I get my payment?	
10. What am I giving up to get a payment?	
Release of Claims	6
11. What claims am I giving up?	
Excluding Yourself From The Settlement	7
12. How do I exclude myself from this settlement?	
13. If I do not exclude myself, can I still sue the Defendants?	
14. If I exclude myself, can I still get a payment?	
Objecting to the Settlement	7
15. What if I do not agree with the terms of the settlement?	
16. What is the difference between Objecting and Excluding?	
The Lawyers Representing You	8
17. Do I need to get a lawyer?	
18. How will the lawyers be paid?	
The Court’s Settlement Final Approval Hearing	8
19. When will the court decide whether to approve this settlement?	
20. Do I have to attend the Hearing?	
If You Do Nothing	9
21. What happens if I do nothing?	
Getting More Information	9
22. How do I get more information?	

BASIC INFORMATION

1. What is this about?

A court authorized this notice because you have a right to know about a proposed settlement in the lawsuit known as *Folweiler v. American Family Insurance Company, et al.*, Case No. Case No. 16-2-16112-0 SEA which is pending in the Superior Court of King County, Washington.

On July 8, 2016, Dr. David Folweiler filed a putative class action against American Family Insurance Company on behalf of his business and a putative class of Washington providers alleging that American Family improperly reduced provider charges submitted under the terms of an insured's PIP or MedPay coverage. Plaintiff challenges Defendants' use of a medical charge database compiled and maintained by FAIR Health to evaluate the reasonableness of a provider's charges. Where a provider's charges exceeded the 85th percentile of charges contained in a medical charge database they were reduced to the 85th percentile. Defendants identified these reductions on the explanation of remittance as Explanation Code P0041 ("Reason Code 41"). Plaintiff claims that the Reason Code 41 reductions violated the Washington Consumer Protection Act and the Washington Insurance Code. The complaint sought damages and certification of a statewide class of medical providers.

Defendants moved to dismiss the lawsuit. Plaintiff filed a motion for summary judgment and to certify a putative class, and the parties engaged in discovery. On February 14, 2017, the lawsuit was dismissed but in 2018 an appellate court reversed the dismissal and reinstated the case. In September 2019, the parties engaged in two days of mediation with Stewart Cogan, a mediator in Seattle, and ultimately reached the settlement described in this notice.

Defendants have vigorously denied and continue to deny any wrongdoing and any liability, but elected to settle to avoid the continued burden and expense of litigation.

2. What businesses are involved in this settlement?

The Defendants in the lawsuit are American Family Insurance Company and American Family Mutual Insurance Company.

3. Why is this a class action?

In a class action, one or more people called the "Class Representative" (in this case, Dr. David Folweiler's business, Folweiler Chiropractic, PS,) sue on behalf of people who have similar claims. All these people are "Class Members" in a "Class." One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

4. Defendants deny wrongdoing

Defendants vigorously denied, and continue to deny, all of the allegations of wrongdoing. The settlement is not an admission by Defendants of any fault, wrongdoing, or liability whatsoever. Defendants instead agreed to the settlement to eliminate the substantial burden, expenses and uncertainties of further litigation.

WHO IS IN THE SETTLEMENT CLASS

To see if you are eligible for benefits from this settlement, you first have to determine if you are a Class Member.

5. How do I know if I am a Class Member?

You may be a Class Member if you were a Washington healthcare provider who from July 8, 2012 through December 23, 2019 had your PIP or MedPay claims for reimbursement of medical expenses reduced by Defendants based on an explanation code P0041 as set out in the Explanation of Remittance form sent to the provider. If you are not sure whether you are included in the Class, you may call the Settlement Administrator, toll free at 1-855-961-0955 or visit AmericanFamilyClassActionPIPSettlement.com

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

6. What does the settlement provide?

Defendants have agreed to pay up to a total of \$6 million to settle this action. That amount includes all attorneys' fees and expenses and case contribution fees awarded by the court as well as the costs for administering the settlement ("Settlement Costs"). It also includes the payments to Class Members who submit timely and valid claims. Each Class Member who submits a valid and timely claim can recover an amount equal to the sum of Reason Code 41 reductions that Defendants took on each provider's bill(s) plus a multiplier. The multiplier is calculated by taking the difference between \$6 million and the Settlement Costs and dividing it by the total amount of Reason Code 41 reductions taken by Defendants (approximately \$2.9 million).

Class Counsel intend to ask the court for an award of attorneys' fees and expenses. Any amount awarded as fees or expenses by the court shall be paid by the Defendants. Defendants have agreed not to oppose any application that does not exceed two million dollars (\$2,000,000).

On behalf of the Class Representative, Class Counsel also intends to seek a case contribution fee not to exceed \$10,000. Defendants have agreed not to oppose Class Counsel's request for the case contribution fee up to that amount and will pay any fee awarded by the court.

HOW TO GET A PAYMENT—SUBMITTING A CLAIM FORM

7. How do I file a claim?

To ask for a payment, you must complete and timely submit a claim form. If you have not received a Claim Form, you may request one by calling the Settlement Administrator at 1-855-961-0955 or visit the Settlement Website at AmericanFamilyClassActionPIPSettlement.com. Please read the instructions carefully, fill out the claim form, and submit it online or mail it postmarked no later than **April 20, 2020** to:

Folweiler v. American Family Insurance
c/o JND Legal Administration
PO Box 91209
Seattle, WA 98111

8. How much is my payment going to be?

In connection with medical bills paid by Defendants pursuant to PIP or MedPay coverage, you can recover the amount of Reason Code 41 reductions taken since July 8, 2012. An additional amount, currently estimated to be approximately 30-40% of your Reason Code 41 reductions, will be added to your refund. By way of example, if Defendants reduced a provider's medical bills covered by the settlement by a total of \$100 and that provider submits a timely and valid claim, she could recover \$100 plus an estimated \$30-\$40 for a total of \$130-\$140.

The exact amount of the multiplier is not yet known and will not be known until all of the Settlement Costs have been calculated.

9. When will I get my payment?

The payments will be mailed to eligible Class Members who send in timely and valid claim forms, after the court grants final approval of the settlement, any appeals are resolved, and the claims administration process is completed. If the court approves the settlement after the final hearing on February 19, 2020, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time. Please be patient.

10. What am I giving up to get a payment?

Unless you exclude yourself from the proposed settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants regarding any of the legal issues involved in the *Folweiler* litigation or that are included within the Released Claims. If you remain a Class Member, you will give a "release" to the Defendants (the "Released Claims") described in greater detail in section 11 below. In addition, if you remain a Class Member, all of the court's orders will apply to you and legally bind you.

The Settlement Agreement, which is available at AmericanFamilyClassActionPIPSettlement.com, describes the exact legal claims that you give up if you do not exclude yourself from the settlement.

RELEASE OF CLAIMS

11. What claims am I giving up?

As part of the Settlement Agreement, the Class Representative and all Class Members who do not exclude themselves from the Settlement agree to release the Defendants and all of their affiliates and other related persons and entities, from any claims, rights, demands, actions, causes of action, suits, Unknown Claims (as defined in paragraph 1.27 of the Settlement Agreement), debts, liens, contracts, liabilities, agreements, interest, costs, expenses, losses, or damages (whether actual, consequential, treble, statutory and/or punitive or exemplary or other), whether arising in law or equity, for or arising out of or related to (i) the allegations that were or could have been asserted by Plaintiff or the Settlement Class in this Lawsuit which relate in any way to the subject matter of the Lawsuit, which was Defendants' use of and the validity, reliability, and lawfulness of the FAIR Health medical charge database to assess whether a provider's bill exceeded the 80th and/or 85th percentile; or (ii) Defendants' review, handling, payment, adjustment or denial, in whole or in part, of claims for PIP or MedPay benefits through Defendants' use of the 80th or 85th percentile of the FAIR Health database.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this settlement, but you want to keep the right to individually sue the Defendants about the issues in this case, then you must take steps to exclude yourself from the settlement. This is called “opting out” of the Settlement Class.

12. How do I exclude myself from this settlement?

To exclude yourself from the settlement, you must send a letter by mail saying that you want to be excluded from *Folweiler v. American Family Insurance Company et al.*, Case No. 16-2-16112-0 SEA. You must include your full name, address, and your signature. You must also include a clear statement that you wish to be excluded from the Settlement Class. You must mail your request for exclusion postmarked by **February 10, 2020** to the address below. You cannot exclude yourself on the phone or by email.

Folweiler v. American Family Insurance
c/o JND Legal Administration
PO Box 91209
Seattle, WA 98111

13. If I do not exclude myself, can I still sue the Defendants?

No. Unless you exclude yourself, you give up any right to individually sue the Defendants for the claims that this settlement resolves. You must exclude yourself from this class to individually sue the Defendants over the claims resolved by this settlement. The deadline to exclude yourself is **February 10, 2020**.

14. If I exclude myself, can I still get a payment?

No. If you exclude yourself, you will not get a payment and you do not need to submit a claim form.

OBJECTING TO THE SETTLEMENT

15. What if I do not agree with the terms of the settlement?

If you are a Class Member (and **have not excluded yourself**), you can object to the settlement if you do not agree with its terms. You can give reasons why you think the court should not approve the settlement. You can also object to Class Counsel’s application for attorneys’ fees and expenses or the case contribution award to the Plaintiff.

To object to the settlement, you must mail a letter to the Clerk of the Court, Class Counsel and Defendants’ Counsel and include the following:

- (a) The name of this lawsuit (*Folweiler v. American Family Insurance Company et al.*, Case No. 16-2-16112-0 SEA);
- (b) Your full name, address and telephone number;
- (c) An explanation of the basis upon which you claim to be a Class Member;
- (d) All grounds for the objection, accompanied by any and all legal or factual support for the objection known to you or your counsel;

- (e) The identity of all counsel who represent you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the settlement or fee application and all legal or factual support for such fees;
- (f) The identity of all counsel representing you who will appear at the final approval hearing (if any);
- (g) A statement confirming whether you intend to personally appear and/or testify at the final approval hearing; and
- (h) Your signature (an attorney's signature shall not be deemed sufficient to satisfy this requirement).

16. What is the difference between Objecting and Excluding?

Objecting is simply telling the court that you do not like something about the settlement. You can object only if you remain a Class Member. If you object, and the court approves the settlement anyway, you will still be bound by the result. Excluding yourself is telling the court that you do not want to be a Class Member. If you exclude yourself, you cannot object because the case no longer affects you.

THE LAWYERS REPRESENTING YOU

17. Do I need to get a lawyer?

The court has appointed David Breskin and Brendan Donckers of Breskin, Johnson & Townsend, PLLC as Class Counsel. You do not have to pay Class Counsel. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this lawsuit, you may hire one at your own expense.

18. How will the lawyers be paid?

Class Counsel intends to submit a fee and expense application, seeking an award based on the value of the settlement and the work performed in an amount not to exceed two million dollars (\$2,000,000). Defendants have agreed not to oppose Class Counsel's fee and expense application up to this amount. The request for fees and expenses will be posted on the Settlement Website, AmericanFamilyClassActionPIPSettlement.com, after it is filed. The court currently is scheduled to decide whether to approve the motion at the final approval hearing.

THE COURT'S SETTLEMENT FINAL APPROVAL HEARING

The court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you do not have to.

19. When will the court decide whether to approve this settlement?

The court has scheduled a final approval hearing at 3:30 p.m., on February 19, 2020, in Courtroom 847 at 516 3rd Avenue, Seattle, Washington 98104. At this hearing, the court will consider whether the settlement is fair, reasonable, and adequate. During the hearing, the court may decide whether to approve the settlement. If there are objections, the court will consider them. The judge may listen to people who have asked to speak about an objection. The court may also decide to approve Class Counsel's fee and expense application and the Class Representative case contribution fee. It is not known how long the hearing or any decision will take. If the hearing is rescheduled, the new date and time will be available on the settlement website.

20. Do I have to attend the Hearing?

You may attend the final approval hearing if you wish, but you are not required to do so. Class Counsel will represent you and answer any questions the judge may have. If you filed a written objection, you or your lawyer acting on your behalf may attend the final approval hearing, but you are not required to do so, and must state in your objection that you would like the opportunity to be heard. You may also pay your own lawyer to attend, but it is not necessary to do so, unless you choose to have a lawyer appear on your behalf to object to the settlement.

IF YOU DO NOTHING

21. What happens if I do nothing?

If you do nothing, you will not receive a payment from the settlement. But, unless you exclude yourself, you will still be bound by the settlement and you will not be able to individually sue the Defendants for the claims resolved in the settlement. You will also be legally bound by all of the orders the court issues and judgments the court makes concerning the lawsuit.

GETTING MORE INFORMATION

22. How do I get more information?

This notice summarizes the proposed settlement. For more information, including copies of the Settlement Agreement, Claim Forms, and other legal documents, visit the settlement website at AmericanFamilyClassActionPIPSettlement.com, call the Settlement Administrator at 1-855-961-0955, or write to:

Folweiler v. American Family Insurance
c/o JND Legal Administration
PO Box 91209
Seattle, WA 98111

Please do not contact the court.