

IN THE CIRCUIT COURT THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

If You Treated an Illinois Workers' Compensation Patient or Illinois First Party Automobile Accident Patient and Your Bill Was Reduced by a PPO Discount, You May Be Entitled To Benefits Under This Settlement. Please Read This Notice Carefully, As It Affects Your Legal Rights

*The Circuit Court of the Third Judicial District, Madison County, Illinois, authorized this notice.
This is not a solicitation from a lawyer.*

- This Settlement concerns a lawsuit alleging that AIG Claims Services, Inc. ("AIGCS") (which changed its name to AIG Domestic Claims Services, Inc. ("AIGDC"), now known as Chartis Claims, Inc. ("CCI")), AIG Marketing, Inc. ("AIGM"), and National Union Fire Insurance Company of Pittsburgh, PA (collectively, "Defendants"), improperly took preferred provider organization ("PPO") reductions on the bills of licensed healthcare providers who treated patients covered by a workers' compensation or automobile policy issued under Illinois law. Prior to the Court deciding whether Plaintiffs could prove these allegations at trial, the Parties have agreed to settle to avoid the costs and uncertainty inherent in continued litigation.
- Under the terms of the Settlement, Settlement Class Members may obtain a cash payment as compensation for the PPO discounts taken by Defendants.
- Your legal rights are affected whether you act or don't act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	If you do nothing and the Court grants final approval of the Settlement, you will automatically be included in the Settlement Class. This means you are bound by the Court's orders in the case and give up your right to be part of any lawsuit concerning the claims in this case. You will not be eligible to receive monetary relief unless you submit a Request Form.
PARTICIPATE IN THE SETTLEMENT	If you wish to participate in the proposed Settlement, you need to complete and return the accompanying Request Form, postmarked no later than March 11, 2010 .
EXCLUDE YOURSELF	You will not be entitled to participate in the Settlement if you choose this option.
OBJECT OR COMMENT WHILE REMAINING IN THE CLASS	Write the Court about why you do, or do not, like the Settlement. You must remain in the class and Settlement to object or comment.
ATTEND THE HEARING	Ask to speak to the Court about the fairness of the Settlement.

- These rights and obligations – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. The ability to potentially receive monetary payment will be available only if the Court approves the Settlement and after any appeals are resolved. Please be patient.

1. **THE LITIGATION:** The lawsuit (*Coy Chiropractic Health Center, Inc. et. al., v. AIG Claims Services, et al.*, No. 05-L-150, Circuit Court, Third Judicial Circuit, Madison County, Illinois), was filed on February 11, 2005, and concerns PPO discounts taken by Defendants on the bills submitted by Settlement Class Members (see paragraph 4 below).

The lawsuit alleges that Defendants improperly took PPO reductions on medical bills submitted by preferred providers to AIGCS, AIGDC, CCI, AIGM, or an insurance company currently or previously affiliated with American International Group, Inc. ("AIG") for medical services relating to treatment of Illinois workers' compensation claimants or individuals covered by the first-party medical claims provision of an automobile policy governed by Illinois law. Plaintiffs claim that Defendants were either not legitimate PPO payors or, in the alternative, failed to provide financial incentives to motivate claimants to seek treatment from the preferred providers.

2. **DEFENDANTS' POSITION:** Defendants have denied and continue to deny all charges of wrongdoing or liability against them arising out of the allegations and claims asserted in the lawsuit. Defendants contend that the lawsuit lacks merit and that their actions at all time complied with Illinois law.
3. **PURPOSE OF THIS NOTICE:** This notice is designed to inform members of the class defined below of the pendency of this litigation and of the proposed Settlement and to describe Settlement Class Members' rights and options.
4. **SETTLEMENT CLASS:** The Court has certified for settlement purposes a class (the "Settlement Class") consisting of: All licensed healthcare providers in Illinois who between January 1, 1995 and the date that the Court grants preliminary approval of the settlement: (i) submitted a bill to AIGCS, AIGDC, CCI, AIGM, or an insurance company currently or previously affiliated with American International Group, Inc. ("AIG") for medical services relating to the treatment of an occupationally ill or injured worker whose workers' compensation claim is governed by Illinois law, or an individual covered by the first-party medical claims provision of an automobile policy also governed by Illinois law; and (ii) whose bill was reduced pursuant to a preferred provider organization discount.

To represent the above Settlement Class for purposes of the Settlement, the Court has appointed the named plaintiffs in this lawsuit as the class representative and has appointed the following attorneys to serve as Class Counsel: LakinChapman, LLC, 300 Evans Avenue, P.O. Box 229, Wood River, Illinois 62095 (Lead Class Counsel); Campbell & McGrady, 3017 Godfrey Road, P.O. Box 505, Godfrey, Illinois 62035 (Additional Counsel).

5. **SETTLEMENT BENEFITS.** Defendants will make payments to Settlement Class Members who submit valid claims. If you are a Settlement Class Member and wish to make a claim, you must fill out and submit the accompanying Request Form, **postmarked no later than March 11, 2010, to AIG PPO Class Action, P.O. Box 2234, Faribault, MN 55021-1634.** Depending on the date of the claim, you may be required to submit additional written proof of your claim. All claims are subject to verification. If it is determined that you previously received a refund for a PPO discount identified in your claim, your payment will be reduced by that amount.
6. **ATTORNEYS' FEES AND EXPENSES:** From the filing of the litigation in 2005 to the present, Class Counsel have not received any payment for their services in prosecuting the case, nor have they been reimbursed for any out-of-pocket costs. If the Court approves the proposed Settlement, Class Counsel will apply to the Court for an award of attorneys' fees and reimbursement of expenses in the total amount of \$1,062,500. Class Counsel will also apply for an incentive award of \$5,000 to the named plaintiffs in this lawsuit for their initiative and effort in pursuing the litigation on behalf of the class. Under no circumstances will you be personally liable for Class Counsel's attorneys' fees or expenses or any incentive award.
7. **RESULT IF COURT APPROVES SETTLEMENT:** If you fall within the Settlement Class definition and remain in the Settlement Class, and the Settlement is approved, the Court will enter a judgment dismissing the lawsuit with prejudice, and releasing any and all claims that you may have against Defendants and all other Released Persons, whether known or unknown, relating to the medical bills you submitted to Defendants and that are at issue in this lawsuit, including but not limited to the PPO discounts taken by Defendants.

In addition, for a period of four years, you will be enjoined in the Final Judgment and Order from commencing or prosecuting any action, either directly, representatively, derivatively, or in any other capacity, whether by a complaint, counterclaim, defense, or otherwise, in any local, state, or federal court, or in any agency or other authority or forum wherever located that relates to PPO discounts taken by Defendants or other Released Persons through the First Health network on or after the date that the preliminary order approving the settlement is entered if the Defendants or other Released Persons, in their sole and unilateral discretion, elect to provide a notice bi-annually to the insureds of an AIG-affiliated insurance company regarding the availability and identity of providers in the First Health PPO network in Illinois.

8. YOUR OPTIONS: If you are a member of the Settlement Class, you have the following options.

- (a) PARTICIPATE IN THE SETTLEMENT – MAKE A CLAIM:** If you wish to participate in the proposed Settlement, you must complete and submit the accompanying Request Form, along with any required documentation, **postmarked no later than March 11, 2010, to AIG PPO Class Action, P.O. Box 2234, Faribault, MN 55021-1634**. If you fail to submit the Request Form by the deadline, you will not be entitled to any Settlement payment but will still be bound by the Settlement and the judgment, including the release of your claims.
- (b) REQUEST TO BE EXCLUDED:** If you do not want to stay in the Settlement Class, then you must send a written notice of your request to exclude yourself from the Settlement Class, so that it is received no later than **October 13, 2009**, to Administrator. Your exclusion request must include (i) your full name, address, and telephone number; (ii) a statement that you request exclusion from the Settlement Class and Settlement in *Coy v. AIG*, Case No. 05-L-150; and (iii) your signature. If you validly and timely request exclusion from the Settlement Class, (1) you will be excluded from the Class; (2) you will not be entitled to a Settlement payment; (3) you will not be bound by the terms of the Settlement, the judgment dismissing the lawsuit, or the release of claims provided by the Settlement; and (4) you will not be entitled to comment on the proposed Settlement or be heard at the fairness hearing described in Paragraph 9 below.
- (c) OBJECT OR COMMENT:** If you are a member of the Settlement Class and you do not request to be excluded, you may object to or offer comment in favor of the terms of the Settlement or to Class Counsel's request for attorneys' fees and expenses. You may, but need not, enter an appearance through counsel of your choice. If you do, you will be responsible for your own attorneys' fees and costs.

If you object to the Settlement, you must, on or before **October 13, 2009**: (1) file with the Clerk of the Circuit Court, Third Judicial Circuit, Madison County, Illinois, located at the Madison County Courthouse, 155 North Main Street, Edwardsville, Illinois 62025, and (2) serve on Robert W. Schmieder II of LakinChapman, LLC, 300 Evans Avenue, P.O. Box 229, Wood River, Illinois 62095-1127 (Lead Class Counsel); and Jeffrey E. Crane, SIDLEY AUSTIN LLP, 1 S. Dearborn St., Chicago, IL, 60603 (Counsel for Defendants), a written objection, which includes: (a) the objector's name, address and telephone number; (b) the name of the case and the case number; (c) a statement of each objection; (d) a written brief detailing the specific reasons, if any, for each objection, including any legal and factual support the objector wishes to bring to the Court's attention and any evidence the objector wishes to introduce in support of the objection; and (e) the identity and number of Settlement Class Members represented by objector's counsel. Objecting Settlement Class Members who appear by counsel or who intend to testify in support of their objection either in person or by affidavit must also make themselves available for deposition by Class Counsel or Defendants' counsel in their county of residence, between the time the objection is filed and fourteen (14) days before the date of the Fairness Hearing. Any Settlement Class Member who files and serves a written objection may appear at the Fairness Hearing, either in person or through personal counsel hired at the Settlement Class Member's expense, but must deliver a Notice of Intention to Appear to Class Counsel and Defendants' counsel, and have it file-marked by the Court no later than October 13, 2009. The Notice of Intention to Appear must: (1) state how much time the Settlement Class Member and/or their attorney anticipates needing to present the objection; (2) identify, by name, address, telephone number and detailed summary of testimony any witnesses the Settlement Class Member and/or their attorney intends to present any testimony from; and (3) identify all exhibits the Settlement Class Member and/or their attorney intends to offer in support of the objection and attach complete copies of all such exhibits. Settlement Class Members who do not timely make their objections in this manner will be deemed to have waived all objections and shall not be heard at the fairness hearing or have the right to appeal from approval of the Settlement.

If you wish to comment in favor of the Settlement, you may send your comment to Robert W. Schmieder II of LakinChapman, LLC, 300 Evans Avenue, P.O. Box 229, Wood River, Illinois 62095 (Lead Class Counsel). At the start of your comment, please include a reference to Coy v. AIG, Case No. 05-L-150.

- 9. FAIRNESS HEARING:** On November 12, 2009, at 1:30 p.m., in the courtroom of the Honorable Daniel Stack, Circuit Judge of the Circuit Court, Third Judicial Circuit, Madison County, Illinois, located at the Madison County Courthouse, 155 North Main Street, Edwardsville, Illinois 62025, Judge Stack will hold a fairness hearing for the purpose of deciding (a) whether the Settlement should be approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting approval of the Settlement and dismissing the lawsuit with prejudice should be entered; and (c) whether Class Counsel's application for attorneys' fees and expenses should be granted. The hearing may be postponed, adjourned, or rescheduled by the Court without further notice to the Settlement Class. You do not need to attend this hearing to remain a Settlement Class Member or participate in the Settlement.
- 10. EXAMINATION OF PAPERS FILED IN THE CASE:** This Notice is a summary and does not describe all details of the Settlement. For full details of the matters discussed in this Notice, you may wish to review the Class Action Settlement Agreement dated August 11, 2009, available online at www.pposettlements.com. A complete copy of the Class Action Settlement Agreement and all other pleadings and papers filed in the lawsuit are also available for inspection and copying during regular business hours at the Office of the Clerk of the Circuit Court, Third Judicial Circuit, Madison County, Illinois, located at the Madison County Courthouse, 155 North Main Street, Edwardsville, Illinois 62025.
- 11. ADDITIONAL INFORMATION:** You can view and print the Class Action Settlement Agreement, this Notice, and the Request Form at www.pposettlements.com. You can also direct inquiries to Class Counsel at ppo.classaction@lakinchapman.com or by mail 300 Evans Avenue, P.O. Box 229, Wood River, Illinois 62095. Please include the reference Coy Chiropractic Health Center, Inc., Case No. 05-L-150. Answers to frequently asked questions are available at www.pposettlements.com.

**PLEASE DO NOT CONTACT THE COURT WITH QUESTIONS
ABOUT THIS NOTICE.**

DATED: September 14, 2009

BY ORDER OF THE CIRCUIT COURT
THIRD JUDICIAL DISTRICT
MADISON COUNTY, ILLINOIS