

IN THE CIRCUIT COURT FOR THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

If you Treated an Illinois, South Dakota, or Wisconsin Workers' Compensation Claimant and Your Bill Was Reduced by a PPO Discount Taken By General Casualty Company of Illinois or General Casualty Company of Wisconsin , You May Be Entitled To Benefits Under This Settlement. Please Read This Notice Carefully, As It Affects Your Legal Rights.

The Circuit Court for the Twentieth Judicial Circuit, St. Clair County, Illinois, authorized this Notice.

This is not a solicitation from a lawyer.

- This Settlement concerns a Lawsuit alleging that General Casualty Company of Illinois (now known as General Casualty Insurance Company) and General Casualty Company of Wisconsin (“General Casualty Defendants”) improperly discounted the bills of licensed healthcare providers who treated an Illinois, South Dakota, or Wisconsin workers’ compensation claimant by taking PPO Discounts.
- “PPO Discount” or “PPO Reduction” means a reduction to a licensed healthcare provider’s bill as a result of the provider’s participation in a preferred provider organization. “PPO Discount” or “PPO Reduction” does not include reductions to a licensed healthcare provider’s bill as a result of a “usual, customary and reasonable” charge review, the application of state fee schedules, or any other reductions except those reductions applied by virtue of the provider’s participation in a preferred provider organization.
- Under the terms of the Settlement, Class Members may obtain a cash payment as compensation for the PPO Reductions the General Casualty Defendants applied.
- 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 be 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 October 12, 2012.
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.

1. THE LITIGATION

The Lawsuit (Dale Fischer, D.C. d/b/a Lebanon Chiropractic, individually and on behalf of others similarly situated v. General Casualty Company of Wisconsin and General Casualty Insurance Company of Illinois, No. 05-L-113, Circuit Court, Twentieth Judicial Circuit, St. Clair County, Illinois), concerns PPO Reductions applied by General Casualty Defendants on the Class Members' bills. The Lawsuit alleges that Defendants incorrectly reduced payments to providers in the Corvel PPO who treated Illinois, South Dakota, or Wisconsin workers' compensation claimants by applying PPO Reductions allegedly not available to them.

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 and deny that any Class Member has any valid claim against them arising from their application of Corvel PPO Reductions.

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 Class Members' rights and options.

4. THE CLASS

On November 13, 2007, the Circuit Court certified the following Class: All licensed healthcare providers in Illinois, South Dakota, and Wisconsin who: (a) submitted a bill to General Casualty Company of Illinois and/or General Casualty Company of Wisconsin between February 16, 1995 and November 13, 2007 for medical services covered by a workers' compensation policy; and (b) received or were tendered payment in an amount less than the submitted bill based on a PPO Discount.

In July 2009, notice was sent to all Class Members, including you. At that time, you elected to remain a Class Member.

To represent the above Class for purposes of the Settlement, the Court has appointed the named plaintiff in this Lawsuit, Dale A. Fischer, D.C., as the Class Representative and has appointed the following attorneys to serve as Class Counsel: SL Chapman LLC, 330 North Fourth Street, Suite 330, St. Louis, Missouri 63102 ("Class Counsel").

5. SETTLEMENT BENEFITS

The following description of the settlement benefits are qualified in their entirety by reference to the Class Action Settlement Agreement, a copy of which can be found at www.pposettlements.com and is on file with the Court.

- (a) **Payments.** Subject to the Aggregate Cap, each Class Member will have the opportunity to receive up to forty percent (40%) of the amount of the PPO Reductions applied by Defendants during the Class Period. Defendants will make payments to Class Members who submit valid claims. If you are a Class Member and wish to make a claim, you must fill out and submit the accompanying Request Form, along with the required documentation, **postmarked no later than October 12, 2012, to General Casualty Settlement, P.O. Box 2804, Faribault MN 55021-8609.**

Verification. All claims are subject to verification. You may be asked to provide additional information or documentation to support your claim.

Prior Payment. If it is determined that you previously received payment of a PPO Reduction identified in your claim, your Settlement payment will be reduced by that amount.

Aggregate Cap. Your Settlement payment may be subject to a pro-rata deduction based upon the \$1.6 million dollar Aggregate Cap set forth in the Settlement Agreement.

6. ATTORNEYS' FEES AND EXPENSES

Since the filing of the litigation in 2005, Class Counsel have not been paid for their services or reimbursed for any costs. If the Court approves the proposed Settlement, Class Counsel will apply to the Court for an award of attorneys' fees of \$400,000 and reimbursement of expenses of \$37,600.25 in the total amount of \$437,600.25. Class Counsel will also apply for a payment of \$2,500 to Dale A. Fischer, D.C. for his initiative and effort in pursuing this litigation on behalf of the Class. Under no circumstances will you be personally liable for Class Counsel's attorneys' fees or expenses or the payment. The attorneys fees, expenses, and payment will be paid out of the Aggregate Cap.

7. RESULT IF COURT APPROVES SETTLEMENT

If you fall within the Class definition and remain in the 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 have or may have against any of the Defendants, including affiliated companies, whether known or unknown, relating to the General Casualty Defendants' application of a PPO Reduction.

8. YOUR OPTIONS

If you are a member of the 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 the required documentation, **no later than October 12, 2012, to General Casualty Settlement, P.O. Box 2804, Faribault MN 55021-8609**. If you fail to submit the Request Form by the deadline, you will not be entitled to any Settlement payment but you will still be bound by the Settlement and the judgment, including the release of your claims against the Defendants. A Request Form submitted by first-class United States Mail shall be deemed to have been submitted when posted if received with a postmark indicated on the envelope. In all other cases, the Request Form shall be deemed to have been submitted when actually received by the Settlement Administrator. If you wish to comment in favor of the Settlement, you may send your comment to Robert W. Schmieder II, SL Chapman LLC, 330 North Fourth Street, Suite 330, St. Louis, Missouri 63102. At the start of your comment, please include a reference to *Dale Fischer, D.C. v. General Casualty*, No. 05-L-113.
- (b) **OBJECT OR COMMENT:** If you are a member of the Class, you may object to or offer comment in favor of the terms of the Settlement or 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 attorney's fees and costs.

If you object to the Settlement, you must, on or before **August 17, 2012**: (1) file with the Clerk of the Circuit Court, Twentieth Judicial Circuit, St. Clair County, Illinois, located at the St. Clair County Courthouse, 10 Public Square, Belleville, Illinois 62220, and (2) serve on (i) Robert W. Schmieder II, SL Chapman LLC, 330 North Fourth Street, Suite 330, St. Louis, Missouri 63102 (Class Counsel), and (ii) Kendall W. Harrison, Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, Wisconsin 53701-2179 (Counsel for General Casualty Defendants) a written objection, verified by sworn affidavit which includes: (a) your name, address and telephone number; (b) the name of the case and the case number; (c) a statement of each objection; and (d) a written brief detailing the specific reasons, if any, for each objection, including any legal and factual support you wish to bring to the Court's attention and any evidence you wish to introduce in support of the objection. If you are represented by counsel for the purposes of objecting to the Settlement, then the objection must also include: (i) the identity and number of other Class Members represented by your counsel; (ii) the number of such represented Class Members who have opted out of the Settlement; (iii) the number of such represented Class Members who have remained in the Settlement and have not objected; (iv) the date your counsel assumed your representation; and (v) a list of the names of all cases where your counsel has objected to a class action settlement in the last three years. Objecting Class Members 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 Class Member who files and serves a written objection may appear at the Fairness Hearing, either in person or through counsel hired at the Class Member's expense, but must deliver a Notice of Intention to Appear to Class Counsel and Defendants' counsel, and have it file-stamped by the Court no later than **August 17, 2012**. The Notice of Intention to Appear must: (1) state how much time the 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 Class Member and/or their attorney intends to present any testimony from; and (3) identify all exhibits the Class Member and/or their attorney intends to offer in support of the objection and attach complete copies of all such exhibits.

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.

9. FAIRNESS HEARING

On September 18, 2012, at 11:00 a.m., in the courtroom of the Honorable Vincent Lopinot, Circuit Judge of the Circuit Court, Twentieth Judicial Circuit, St. Clair County, Illinois, located at the St. Clair County Courthouse, 10 Public Square, Belleville, Illinois 62220, Judge Lopinot 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 Class. You do not need to attend this hearing to remain a Class Member or to 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 June 22, 2012, 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, Twentieth Judicial Circuit, St. Clair County, Illinois, located at the St. Clair County Courthouse, 10 Public Square, Belleville, Illinois 62220.

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 classaction@slchapman.com or by mail to SL Chapman LLC, 330 North Fourth Street, Suite 330, St. Louis, Missouri 63102. Please include the reference *Dale Fischer, D.C. v. General Casualty*, No. 5-L-113. Answers to frequently-asked questions are available at www.pposettlements.com or by calling 1-800-657-1974.

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

DATED: June 29, 2012

BY ORDER OF THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS