

This is a notice of a settlement of a class action lawsuit.

This is not a notice of a lawsuit against you.

If you are a person to whose cellular telephone number United HealthCare Services, Inc. (“United”) placed one or more artificial or prerecorded voice calls, regarding the Optum® HouseCalls program relating to a UnitedHealthcare plan that is not, or was not, your own plan, or the plan of someone you are authorized to represent, between October 12, 2019 through February 10, 2025 may be entitled to compensation as a result of the settlement in the class action lawsuit captioned:

Johnson v. United HealthCare Services, Inc., No. 5:23-cv-00522 (M.D. Fla.)

A federal court authorized this notice.

This is not a solicitation from a lawyer.

Please read this notice carefully.

It explains your rights and options to participate in the class action settlement.

- The settlement will result in a \$3,495,000 fund to fully settle and release certain claims of persons to whose cellular telephone numbers United placed one or more artificial or prerecorded voice calls, regarding the Optum® HouseCalls program relating to a UnitedHealthcare plan that is not, or was not, that person’s own plan, or the plan of someone that person is or was authorized to represent, between October 12, 2019 through February 10, 2025.
- The settlement fund will be used to pay settlement amounts to settlement class members who elect to participate after deducting the costs of settlement notice and administration, attorneys’ fees, and litigation costs and expenses.
- If you are a settlement class member, your legal rights are affected, and you now have a choice to make:

SUBMIT A TIMELY CLAIM FORM	If you timely submit a valid, approved Settlement Claim Form by April 25, 2025, you will receive a share of the settlement fund after certain deductions, and you will release certain Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, claims you may have against United.
DO NOTHING	If you do nothing, you will <u>not</u> receive a share of the settlement fund, but if you are a settlement class member, you will release certain TCPA claims you may have against United.
EXCLUDE YOURSELF	If you exclude yourself from the settlement, you will <u>not</u> receive a share of the settlement fund, and you will <u>not</u> release any TCPA claims you may have against United. The deadline to exclude yourself is April 25, 2025.
OBJECT	Write to the court about why you do not like the settlement. The deadline to object is April 25, 2025.

Why is this notice available?

This is a notice of a settlement in a class action lawsuit. The settlement would resolve the class action lawsuit Elaine Johnson filed against United. Please read this notice carefully. It explains the class action lawsuit, the settlement, and legal rights you may have, including the process for receiving a settlement check, excluding yourself from the settlement, or objecting to the settlement.

What is the class action about?

Ms. Johnson filed a class action lawsuit against United alleging that United violated the TCPA by placing certain calls to cellular telephone numbers in connection with which United used an artificial or prerecorded voice absent prior express consent, relating to a UnitedHealthcare plan that is not, or was not, her own plan, or the plan of someone Ms. Johnson was authorized to represent. The TCPA allows for damages in the amount of \$500 per violation, and up to \$1,500 for willful violations. However, prior express consent is a complete defense to a claim under the TCPA. You can find additional information about Ms. Johnson's claims in her class action complaint, which is available at www.OptumHouseCallsTCPAClassActionSettlement.com in the Case Documents section.

Why is this a class action?

In a class action, one or more people called "class representatives" file a class action lawsuit on behalf of people who have similar claims. All of these people together are a "class" or "class members." The court accordingly resolves claims for all class members at once, except for those who first exclude themselves from the class.

Why is there a settlement?

Ms. Johnson, on the one hand, and United, on the other, have agreed to settle the class action lawsuit to avoid the time, risk, and expense associated with it, and to achieve a final resolution of the disputed claims. Under the settlement, settlement class members will obtain a payment in settlement of claims Ms. Johnson raised in the class action lawsuit. Ms. Johnson and her attorneys think the settlement is fair and reasonable.

How do you know if your claims are included in the settlement?

The settlement resolves claims on behalf of the following settlement class:

All persons and entities throughout the United States (1) to whom United HealthCare Services, Inc. placed a call regarding the Optum® HouseCalls program relating to a UnitedHealthcare plan, (2) directed to a cellular telephone number customarily used by a person who is not and was not a UnitedHealthcare member or plan holder, (3) in connection with which United HealthCare Services, Inc. used an artificial or prerecorded voice, (4) from October 12, 2019 through February 10, 2025.

What does the settlement provide?

United will establish a settlement fund in the amount of \$3,495,000 to compensate members of the settlement class. Out of the settlement fund will be paid:

- a. Settlement compensation to participating settlement class members;
- b. Notice and administration costs not to exceed \$306,000;
- c. An award of attorneys' fees not to exceed one-third of the settlement fund, subject to the court's approval; and
- d. Litigation costs and expenses incurred in litigating the TCPA claims in this matter not to exceed \$50,000, subject to the court's approval.

Each member of the settlement class who submits a timely, valid, and approved Settlement Claim Form will be entitled, subject to the provisions of the settlement agreement, to his or her equal share of the \$3,495,000 settlement fund as it exists after deducting:

- a. Notice and administration costs (including related taxes and expenses);
- b. An award of attorneys' fees; and
- c. Litigation costs and expenses incurred in litigating the claims in this matter.

It is estimated that each participating member of the settlement class will receive between \$50 and \$125. The actual amount each participating member of the settlement class will receive may be more or less depending on the number of settlement class members who submit timely, valid, and approved claims.

After negotiating and agreeing to the class action settlement in this matter, Ms. Johnson negotiated and agreed to a separate settlement with United that provides for a payment to her in exchange for a release of claims against United that are not released as a result of the class action settlement. This payment to Ms. Johnson will not be made from the \$3,495,000 settlement fund to be created as part of the class action settlement in this matter, and will not dilute any compensation available to settlement class members as a result of the class action settlement.

How can you get a payment?

You must mail a valid, approved Settlement Claim Form to the *Johnson v. United HealthCare Services* Settlement Administrator, P.O. Box 301172, Los Angeles, CA 90030-1172, postmarked by April 25, 2025. Or you must submit a valid, approved claim through www.OptumHouseCallsTCPAClassActionSettlement.com by April 25, 2025.

When will you be paid?

If the court grants final approval of the settlement, settlement checks will be mailed, no later than 30 days after the judgment in the lawsuit becomes final, to settlement class members who timely mailed or submitted valid, approved Settlement Claim Forms. If there is an appeal of the settlement, payment may be delayed.

What rights are you giving up in connection with this settlement?

If you fall within the settlement class, and unless you exclude yourself from the settlement, you will give up your right to sue or continue a lawsuit against United over the released claims, as defined in the settlement agreement. Giving up your legal claims is called a release. If you fall within the settlement class, unless you formally exclude yourself from the settlement, you will release certain TCPA claims you may have against United.

For more information about the release, released parties, and released claims, you may obtain a copy of the class action settlement agreement from the settlement website, www.OptumHouseCallsTCPAClassActionSettlement.com, or from the clerk of the United States District Court for the Middle District of Florida.

How can you exclude yourself from the settlement?

If you fall within the settlement class, you may exclude yourself from the settlement, in which case you will not receive a payment, and you will not release any TCPA claims you may have against United. If you fall within the settlement class, and if you wish to exclude yourself from the settlement, you must mail a written request for exclusion to the Settlement Administrator at the following address, postmarked by April 25, 2025:

Johnson v. United HealthCare Services Settlement Administrator
ATTN: EXCLUSION REQUEST
P.O. Box 301172
Los Angeles, CA 90030-1172

You must include in your request for exclusion:

- a. Your full name;
- b. Your address;
- c. The telephone number called by United demonstrating that you are a member of the settlement class; and
- d. A clear and unambiguous statement that you wish to be excluded from the settlement, such as “I request to be excluded from the settlement in the *Johnson v. United HealthCare, Inc.* action.”

You must sign the request personally. If any person signs on your behalf, that person must attach a copy of the power of attorney authorizing that signature.

When and where will the court decide whether to approve the settlement?

The court will hold a Final Fairness Hearing on July 10, 2025. The hearing will take place at the United States District Court for the Middle District of Florida, 401 West Central Boulevard, Orlando, FL 32801. At the Final Fairness Hearing, the court will consider whether the settlement is fair, reasonable, and adequate and, if so, whether final approval of the settlement should be granted. The court will also hear objections to the settlement, if any. The court may make a decision at that time, postpone a decision, or continue the hearing.

The date of the Final Fairness Hearing may change without further notice. Settlement class members should check the settlement website, www.OptumHouseCallsTCPAClassActionSettlement.com, or the court's Public Access to Court Electronic Records ("PACER") site to confirm that the date has not changed.

Do you have to attend the Final Fairness Hearing?

No, there is no requirement that you attend the Final Fairness Hearing. However, you are welcome to attend the hearing at your own expense. You cannot speak at the hearing if you have excluded yourself from the settlement class because the settlement no longer affects your legal rights.

What if you want to object to the settlement?

If you fall within the settlement class, and if you do not exclude yourself from the settlement class, you can object to the settlement, or any part of it, if you do not believe it is fair, reasonable, and adequate. If you fall within the settlement class, and if you wish to object, you must mail a written notice of objection, postmarked by April 25, 2025, to class counsel, counsel for United, and to the court, at the following addresses:

Class Counsel:

Aaron D. Radbil
Greenwald Davidson Radbil PLLC
5550 Glades Road
Suite 500
Boca Raton, FL 33431

Counsel for United:

Carolyn A. DeLone
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004

The court:

United States District Court for the
Middle District of Florida
207 Northwest Second Street
Ocala, FL 34475

You must include in your objection:

- a. Your full name;
- b. Your address;
- c. The telephone number to which United placed a subject artificial or prerecorded voice call between October 12, 2019 through February 10, 2025, to demonstrate that you are a member of the settlement class;
- d. A statement of the objection;
- e. A description of the facts underlying the objection;
- f. A description of the legal authorities that support each objection;
- g. A statement noting whether you intend to appear at the Final Fairness Hearing;
- h. A list of all witnesses that you intend to call by live testimony, deposition testimony, or affidavit or declaration testimony;
- i. A list of exhibits that you intend to present at the Final Fairness Hearing; and
- j. Your signature.

By filing an objection, you can ask the court to deny approval of the settlement. But you cannot ask the court to order a different settlement. The court can only approve or reject the settlement. If the court denies approval, no settlement payments will be sent out and the class action lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed settlement must be in writing. If you fall within the settlement class, and if you submit a timely written objection, you may, but are not required to, appear at the Final Fairness Hearing. If you appear through an attorney, you are responsible for hiring and paying that attorney.

By when must you enter an appearance?

Any settlement class member who objects to the settlement and wishes to enter an appearance must do so by April 25, 2025. To enter an appearance, you must file with the clerk of the court a written notice of your appearance, and you must serve a copy of that notice, by U.S. mail or hand-delivery, upon class counsel and counsel for United, at the addresses set forth in this notice.

What if you do nothing?

If you are a member of the settlement class, you do nothing, and the court approves the settlement agreement, you will not receive a share of the settlement fund, but you will release certain TCPA claims you may have against United. If you fall within the settlement class, unless you exclude yourself from the settlement, you will not be able to sue or continue a lawsuit against United over the released TCPA claims.

What will happen if the court does not approve the settlement?

If the court does not finally approve the settlement, or if it finally approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will receive no benefits from the settlement, and the class action lawsuit will continue.

Who is Ms. Johnson's attorney?

Ms. Johnson's attorney is:

Aaron D. Radbil
Greenwald Davidson Radbil PLLC
5550 Glades Road
Suite 500
Boca Raton, FL 33431

The court has appointed Ms. Johnson's attorney to act 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 case, you must hire one at your own expense.

Who is United's attorney?

United's attorney is:

Carolyn A. DeLone
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004

Before what court is this matter pending?

Ms. Johnson filed her class action lawsuit in the following court:

United States District Court for the Middle District of Florida
207 Northwest Second Street
Ocala, FL 34475

Where can you get additional information?

This notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please see the settlement agreement available at www.OptumHouseCallsTCPAClassActionSettlement.com, by contacting class counsel, by accessing the court docket in this case, for a fee, through the court's PACER system, or by visiting the office of the clerk of the court for the United States District Court for the Middle District of Florida.

Or, to obtain additional information about this matter, please contact:

Johnson v. United HealthCare Services Settlement Administrator
P.O. Box 301172
Los Angeles, CA 90030-1172
1-833-419-3898

Please do not call the judge about this class action. Neither he, nor any court personnel, will be able to give you advice about this class action. Furthermore, because neither United nor United's attorneys represent you, they cannot give you legal advice about this class action.

Important Dates

February 10, 2025:	Order Preliminarily Approving the Settlement Entered
March 10, 2025:	Defendant to fund Settlement Fund
March 14, 2025:	Notice Sent
March 28, 2025:	Attorneys' Fees Petition Filed
April 15, 2025:	Opposition to Attorneys' Fees Petition
April 25, 2025:	Deadline to Submit Claims, Send Exclusion, or File Objection
May 9, 2025:	Reply in Support of Attorneys' Fees Petition (fourteen days after the deadline for settlement class members to submit claims, object to, or exclude themselves from, the settlement)
May 30, 2025:	Motion for Final Approval Filed
June 20, 2025:	Opposition to Motion for Final Approval Filed
June 25, 2025:	Settlement Administrator will provide a sworn declaration attesting to proper service of the Class Notice and Settlement Claim Forms, and state the number of claims, objections, and opt-outs, if any.
June 30, 2025:	Reply in support of Motion for Final Approval
July 3, 2025:	Deadline for the parties to respond to any objection (seven days before Final Fairness Hearing)
July 10, 2025:	Final Fairness Hearing