

SUPERIOR COURT OF WASHINGTON
IN AND FOR PIERCE COUNTY

M.N., A.B., G.T., and W.N., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MULTICARE HEALTH SYSTEM, INC., a
Washington corporation,

Defendant.

No. 18-2-08055-5

**DECLARATION OF BENJAMIN
GOULD IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

I, Benjamin Gould, declare as follows:

1. I am a partner at Keller Rohrbach L.L.P. and one of the attorneys of record for Plaintiffs in this action. I make this declaration based on my own personal knowledge and if called as a witness, I could and would competently testify to the facts stated herein.

2. This declaration is intended to update the Court about how the proposed Plan of Allocation has been revised to ensure that as many Class Members as possible are sent payments; how many Settlement Class Members have received notice; and what additional measures Class Counsel have taken to ensure that Settlement Class Members are not merely *sent*, but actually *receive*, payments from the Net Settlement Fund.

I. REVISIONS TO THE PROPOSED PLAN OF ALLOCATION

3. Under the originally proposed Plan of Allocation, Settlement Class Members

1 were required to provide their Form W-9 information (i.e., social security number and address)
2 to the Settlement Administrator before receiving payment.¹ Class Counsel would have preferred
3 not to impose this requirement, but under current law, the Settlement Administrator is required
4 to report the payments of \$600 and above to the Internal Revenue Service using Form 1099.

5 4. Beginning on January 1, 2026, however, the minimum payment that must be
6 reported to the IRS using Form 1099 will rise to \$2,000. *See* Pub. L. No. 119-21, § 70433(a),
7 139 Stat. 72, 243 (2025). Here, per capita payments to Settlement Class Members will be about
8 \$850. Thus, if payments are made to Settlement Class Members in 2026, Settlement Class
9 Members will not need to provide their Form W-9 information before receiving payment.

10 5. Due to this change in the law, Plaintiffs suggest that the Plan of Allocation be
11 revised (1) to allow Settlement Class Members to be sent payments from the Settlement Fund
12 without having to provide their Form W-9 information; and (2) to require payments to
13 Settlement Class Members to be sent in 2026. Because (as I will discuss in more detail below)
14 most Settlement Class Members seem unlikely to provide their Form W-9 information, the
15 revised Plan of Allocation that Plaintiffs advocate will authorize the Settlement Administrator to
16 send payments to far more Settlement Class Members than would otherwise be permitted.

17 6. Requiring payments to be sent in 2026 will not result in material delay (if any
18 delay at all). The hearing on Plaintiffs' motion for final approval of the Settlement Agreement
19 will be held December 19, 2025. Even if the Settlement Agreement should receive final
20 approval that day, the Settlement Administrator probably could not distribute payments to
21 Settlement Class Members in 2025 in any event, in light of the short time—and the holidays—
22 that intervene between December 19 and the beginning of 2026.

23 7. The Plan of Allocation, as the Court may recall, is not a necessary or material
24 term of the Settlement, and “any decision by the Court concerning the Plan of Allocation shall
25

26 ¹ *See* Am. Class Action Settlement Agreement, Ex. B, ¶ 13, *available at*
<https://www.multicarehealthsettlement.com/Content/Docs/AmendedSettlementAgreement.pdf#page=42>.

not affect the validity or finality of the proposed Settlement Agreement.” Am. Class Action Settlement Agreement ¶ 78, *available at* <https://www.multicarehealthsettlement.com/Content/Docs/AmendedSettlementAgreement.pdf#page=17>. Thus, the Court may approve the proposed revision to the Plan of Allocation without affecting the Settlement Agreement or the approval process in any way.

8. A true and correct copy of the revised proposed Plan of Allocation is attached hereto as **Exhibit A**. A copy of the revised proposed Plan of Allocation that shows changes made to the original proposed Plan of Allocation is attached hereto as **Exhibit B**.

II. NOTICE

9. The Settlement Administrator transmitted the Postcard Notice and Email Notice to Settlement Class Members on October 3. A true and correct copy of a sworn declaration by Julie N. Green, President of Settlement Administrator the CPT Group, is attached hereto as **Exhibit C**. In its latest report on Postcard Notice and opt-outs, dated November 14, the Settlement Administrator gave Class Counsel the following data:

	Description	Count
Mail	Items in Mailing List	2,737
	Notices Returned	288
	Notices Traced	285
	Notices Rемаiled*	142
	Forwarded Notices	17
	Notices Returned 2nd Time	0
	Undelivered Notices	146
* Includes Forwarded Notices		
Responses	Responses Received	381
	Opt Outs	0
	Objections	0
	Disputes	0
	Deficient	0
	Late Opt Outs	0
	Invalid	0
Class	"Valid" Opt Outs**	0
	** Includes Deficient and Late Opt Outs	
	No. of Class Members in Mailing List	2,737
	No. of Valid Opt Outs	0
	% Valid Opt Outs	0.00 %
	Total Class Members – Less Opt Outs	2,737

1
2 10. As this table shows, the Settlement Administrator mailed 2,737 Postcard Notices.
3 Out of these, 288 were returned. Out of the 288 Settlement Class Members for whom Postcard
4 Notices were returned, the Settlement Administrator has thus far skip traced 285. It has
5 successfully remailed 142 Postcard Notices.

6 11. In addition, the Settlement Administrator's records, which I have reviewed, show
7 that 1,710 Email Notices were transmitted. Out of those, only 33 were "bounced"—i.e., returned
8 as undelivered. This suggest that 1,677 Email Notices have been successfully delivered.

9 12. Thus far, we are aware of no objections by Settlement Class Members to the
10 Settlement Agreement.

11 **III. FURTHER EFFORTS TO ENSURE THAT SETTLEMENT CLASS MEMBERS**
12 **ACTUALLY RECEIVE PAYMENTS**

13 13. The table above also shows that, as of November 14, only 381 Settlement Class
14 Members (out of approximately 2,750) have gone to the Settlement Website and entered
15 information about how they want to receive payment (by check, Venmo, etc.) and confirmed
16 that the physical address on file, if any, is correct. This low number came as some surprise to us,
17 given the successful Plan of Notice and the ease with which Settlement Class Members can
18 enter their W-9 information on the Settlement Website.

19 14. Thankfully, the W-9 information, under the revised proposed Plan of Allocation,
20 will no longer be necessary to receive payment. *See supra* ¶¶ 3-4.

21 15. Even so, one consequence will still attend Settlement Class Members who do not
22 enter their W-9 information and select another method of payment: they cannot be paid
23 electronically and instead must be mailed checks. *See Ex. A, ¶ 6.* That is out of necessity: for
24 these Settlement Class Members, checks provide the only practicable method of payment.

25 16. Crucially, however, Class Counsel's extensive experience with class action
26 settlements strongly suggests that where checks in class action settlements are mailed without

1 the affirmative election of the class member—even large checks—they are too often left
2 uncashed.

3 17. Settlement Class Members who do not cash their checks do not receive the
4 benefits they are owed under the Settlement Agreement. When a check is not cashed, the
5 Settlement Fund will have spent money to mail a check that does not actually benefit anyone.
6 This is an outcome that Class Counsel want to avoid. We want as many Settlement Class
7 Members as possible to receive the benefits they are due under the Settlement Agreement, and
8 we want to avoid spending the Settlement Classes' money on postage that ends up benefiting
9 nobody at all.

10 18. Plus, if checks to Settlement Class Members are never cashed, the Parties and the
11 Court are left with unclaimed money in the Settlement Fund. If it is administratively and
12 economically feasible, residual Settlement Funds may be redistributed to those Settlement Class
13 Members who previously cashed checks or entered their electronic-payment information; if that
14 kind of redistribution is not feasible, the Court may make a *cy pres* distribution. *See* Ex. A, ¶ 9;
15 *see also Summers v. Sea Mar Cmty. Health Ctrs.*, 29 Wash. App. 2d 476, 495–96, 541 P.3d 381
16 (2024) (discussing what a *cy pres* distribution is and when it is appropriate). These are
17 necessarily second-best options compared to an equal per-capita distribution of the Net
18 Settlement Fund to all Settlement Class Members.

19 19. Thus, Class Counsel want to minimize the number of uncashed checks. And, in
20 our experience, there are three principal ways of doing so:

21 A. going beyond minimum notice requirements and reminding busy class
22 members of the existence of the settlement;

23 B. providing an easy way for class members to receive funds electronically
24 instead of by check; and

25 C. ensuring that class members' physical addresses are on file and up to date
26 to avoid mailing checks to inaccurate addresses.

1 20. To check all three of these boxes, Class Counsel (with the Defendant's assent)
2 designed reminder notices for the Settlement Administrator to send to Settlement Class
3 Members. Settlement Class Members with physical addresses on file will receive postcard
4 reminders. Settlement Class Members with email addresses on file will receive email reminders.
5 Settlement Class Members with both kinds of address on file will receive both kinds of
6 reminders.

7 21. The Settlement Administrator transmitted the email and postcard reminders on
8 November 14, 2025. The additional cost to the Settlement Fund of the reminders was only about
9 \$2,000.

10 22. A true and correct copy of the form postcard reminder is attached hereto as
11 **Exhibit D**. A true and correct copy of the form email reminder is attached hereto as **Exhibit E**.

12 23. Like the Postcard Notice and Email Notice, the reminders encourage the
13 Settlement Class Members to visit the Settlement Website, select their payment method, and
14 ensure their physical address is on file and up to date. The reminders both provide an easy way
15 for Settlement Class Members to do so: the postcard reminder contains a QR code and the email
16 reminder, a hyperlink.

17 I declare under penalty of perjury under the laws of the State of Washington that the
18 foregoing is true and correct.

19 Executed this 14th day of November, 2025, at Seattle, Washington.

20
21 s/ Benjamin Gould
22 Benjamin Gould
23
24
25
26

Exhibit A

REVISED PLAN OF ALLOCATION

1. **Definitions.** Unless otherwise defined, terms used in this Plan of Allocation have the same meaning as in the Settlement Agreement.

2. **Nonreversionary common fund.** This is a common-fund settlement; there shall be no reversion of the Settlement Fund to Defendant upon the occurrence of the Final Date.

3. **Allocation of payments to Settlement Class Members.** The Net Settlement Fund—including, to the greatest extent practicable, all interest earned on the Settlement Fund that is not part of the Fee and Expense Award—shall be allocated per capita to every Settlement Class Member

A. for whom the Settlement Administrator has a physical address on file, if the Postcard Notice for the Settlement Class Member was successfully delivered to that physical address; or

B. who has provided a preferred payment method using the Settlement Website.

4. **Waiver and release.** The small number of Settlement Class Members who both lack a physical address to which the Settlement Administrator was able to successfully deliver a Postcard Notice, and who have not provided a preferred payment method using the Settlement Website, shall not be sent a payment, and shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

5. **Date of distribution of payments.** Distribution of payments shall occur as early as is practicable in 2026 to take advantage of the fact that, beginning on January 1, 2026, the Settlement Administrator need not report payments to the Internal Revenue Service via a Form 1099 if such payments are below \$2,000. The Settlement Administrator will therefore be able to distribute payments to Settlement Class Members even if they have not provided their Social Security Numbers to the Settlement Administrator using the Settlement Website.

6. **Distribution of payments by check.** Payments shall be distributed to Settlement Class Members by check unless they elect to receive payment electronically.

7. **Electronic distribution of payments.**

A. Payments shall be distributed to Settlement Class Members by electronic means, including, if administratively practicable, via ACH, Venmo, PayPal, and Zelle.

B. The Postcard Notice, Email Notice, and Long-Form Notice shall inform Settlement Class Members of the availability of such electronic means of payment as the Settlement Administrator will make available to Settlement Class Members, and shall direct Settlement Class Members to the Settlement Website, where via a secure portal they will be able to elect an electronic means of payment and give the Settlement Administrator the information necessary to effect such payment.

C. The secure portal shall prominently inform Settlement Class Members that their election to receive payment electronically is final and irrevocable.

8. **Unclaimed payments.**

A. If a payment distributed to a Settlement Class Member via a check is not negotiated within 120 days after the Settlement Administrator has contacted, or made reasonable attempts to contact, the Settlement Class Member, the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement. If a Settlement Class Member reasonably requests that a check be reissued, the Settlement Administrator shall reissue it.

B. If a check to a Settlement Class Member is returned as undeliverable, the Settlement Administrator shall attempt to obtain a new mailing address for the Settlement Class Member and effect a second mailing. If, after a second mailing, the check is again returned as undeliverable, or if the Settlement Administrator, after reasonable efforts, is unable to determine a second mailing address, there is no obligation to take further efforts

to distribute the check, and the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

C. If a payment made to a Settlement Class Member electronically is unable to be processed, the Settlement Administrator shall make reasonable efforts to contact the Settlement Class Member to correct the problem. If the Settlement Class Member does not provide a corrected means of electronic payment within a reasonable amount of time, or provides a means of electronic payment that is unable to be processed, there is no obligation to take further efforts to distribute the payment, and the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

9. **Residual funds.** If, after the process outlined in Sections 5 through 7 is completed, there remain funds in the Net Settlement Fund, such remaining funds shall be distributed as follows:

A. If it is administratively and economically feasible to distribute the remaining funds to Settlement Class Members or some portion thereof, then Class Counsel, in consultation with the Settlement Administrator, shall propose to the Court an equitable method for doing so. Such method of distribution shall be effected if the Court approves (or approves it in modified form).

B. To the extent there is no distribution of remaining funds according to Subsection A of this Section, or if funds still remain after distribution according to Subsection A of this Section, the Parties shall confer and present to the Court a proposal for treatment of the remaining funds that is consistent with CR 23. Such proposal shall be effected if the Court approves (or approves it in modified form).

10. **Modification of provisions related to unclaimed payments and residual funds.** Should the Parties agree, after final approval of the Settlement Agreement, that the provisions of this Plan of Allocation governing unclaimed payments and residual funds should

be modified in the interests of justice, they shall seek the Court's approval for such modification. If the Court approves, the provisions governing unclaimed payments and residual funds shall be effected as modified.

Exhibit B

REVISED PLAN OF ALLOCATION

1. **Definitions.** Unless otherwise defined, terms used in this Plan of Allocation have the same meaning as in the Settlement Agreement.

2. **Nonreversionary common fund.** This is a common-fund settlement; there shall be no reversion of the Settlement Fund to Defendant upon the occurrence of the Final Date.

3. **Allocation of payments to Settlement Class Members.** The Net Settlement Fund—including, to the greatest extent practicable, all interest earned on the Settlement Fund that is not part of the Fee and Expense Award—shall be allocated per capita to every Settlement Class Member

A. for whom the Settlement Administrator has a physical address on file, if the Postcard Notice for the Settlement Class Member was successfully delivered to that physical address; or

B. who has provided a preferred payment method using the Settlement Website.

4. **Waiver and release.** The small number of Settlement Class Members who both lack a physical address to which the Settlement Administrator was able to successfully deliver a Postcard Notice, and who have not provided a preferred payment method using the Settlement Website, shall not be sent a payment, and shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

5. **Date of distribution of payments.** Distribution of payments shall occur as early as is practicable in 2026 to take advantage of the fact that, beginning on January 1, 2026, the Settlement Administrator need not report payments to the Internal Revenue Service via a Form 1099 if such payments are below \$2,000. The Settlement Administrator will therefore be able to distribute payments to Settlement Class Members even if they have not provided their Social Security Numbers to the Settlement Administrator using the Settlement Website.

Deleted: every

Deleted: who provides the information necessary to the Settlement Administrator (e.g., social security number).

Deleted: Failure to provide necessary information

Deleted: If a Settlement Class Member has failed to provide the information necessary to the Settlement Administrator by the date of the Final Approval Hearing, such Settlement Class Member

6. **Distribution of payments by check.** Payments shall be distributed to Settlement Class Members by check unless they elect to receive payment electronically.

7. **Electronic distribution of payments.**

A. Payments shall be distributed to Settlement Class Members by electronic means, including, if administratively practicable, via ACH, Venmo, PayPal, and Zelle.

B. The Postcard Notice, Email Notice, and Long-Form Notice shall inform Settlement Class Members of the availability of such electronic means of payment as the Settlement Administrator will make available to Settlement Class Members, and shall direct Settlement Class Members to the Settlement Website, where via a secure portal they will be able to elect an electronic means of payment and give the Settlement Administrator the information necessary to effect such payment.

C. The secure portal shall prominently inform Settlement Class Members that their election to receive payment electronically is final and irrevocable.

8. **Unclaimed payments.**

A. If a payment distributed to a Settlement Class Member via a check is not negotiated within 120 days after the Settlement Administrator has contacted, or made reasonable attempts to contact, the Settlement Class Member, the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement. If a Settlement Class Member reasonably requests that a check be reissued, the Settlement Administrator shall reissue it.

B. If a check to a Settlement Class Member is returned as undeliverable, the Settlement Administrator shall attempt to obtain a new mailing address for the Settlement Class Member and effect a second mailing. If, after a second mailing, the check is again returned as undeliverable, or if the Settlement Administrator, after reasonable efforts, is unable to determine a second mailing address, there is no obligation to take further efforts

Deleted: <#>The period during which Settlement Class Members may elect to receive payment electronically will end on the date of the Final Approval Hearing.¶

to distribute the check, and the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

C. If a payment made to a Settlement Class Member electronically is unable to be processed, the Settlement Administrator shall make reasonable efforts to contact the Settlement Class Member to correct the problem. If the Settlement Class Member does not provide a corrected means of electronic payment within a reasonable amount of time, or provides a means of electronic payment that is unable to be processed, there is no obligation to take further efforts to distribute the payment, and the Settlement Class Member shall be deemed to have waived and released their claim for payment under the Settlement Agreement.

9. **Residual funds.** If, after the process outlined in Sections 5 through 7 is completed, there remain funds in the Net Settlement Fund, such remaining funds shall be distributed as follows:

A. If it is administratively and economically feasible to distribute the remaining funds to Settlement Class Members or some portion thereof, then Class Counsel, in consultation with the Settlement Administrator, shall propose to the Court an equitable method for doing so. Such method of distribution shall be effected if the Court approves (or approves it in modified form).

B. To the extent there is no distribution of remaining funds according to Subsection A of this Section, or if funds still remain after distribution according to Subsection A of this Section, the Parties shall confer and present to the Court a proposal for treatment of the remaining funds that is consistent with CR 23. Such proposal shall be effected if the Court approves (or approves it in modified form).

10. **Modification of provisions related to unclaimed payments and residual funds.** Should the Parties agree, after final approval of the Settlement Agreement, that the provisions of this Plan of Allocation governing unclaimed payments and residual funds should

be modified in the interests of justice, they shall seek the Court's approval for such modification. If the Court approves, the provisions governing unclaimed payments and residual funds shall be effected as modified.

[4909-2177-9319, v. 1](#)

Deleted: 4909-2177-9319, v. 14898-4009-7093, v. 4

Exhibit C

SUPERIOR COURT OF WASHINGTON
IN AND FOR PIERCE COUNTY

M.N., A.B., G.T., and W.N., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MULTICARE HEALTH SYSTEM, INC., a
Washington corporation,

Defendant.

No. 18-2-08055-5

**DECLARATION OF JULIE N. GREEN
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

I, Julie N. Green, declare as follows:

1. I am the President of CPT Group, Inc. ("Settlement Administrator" or "CPT").

The following statements are based on my personal knowledge, the information provided to me by Counsel for the parties and other CPT employees working on this matter, and records of CPT generated and maintained in the usual course of business. If called on to do so, I could and would competently testify to the facts stated herein.

2. I submit this declaration at the request of Class Counsel in support of the Motion for Final Approval of Class Action Settlement.

3. CPT has provided Notice and Claims Administration services as provided in the Amended Class Action Settlement Agreement ("Amended Settlement Agreement") and described in my declaration attached to that Amended Settlement Agreement.

1 4. On October 3, 2025, in accordance with the Notice Plan described in my earlier
2 declaration, CPT transmitted Email Notice and Postcard Notice to all Settlement Class Members
3 for whom MultiCare had provided contact information (i.e., mailing address, and to the extent
4 available, email address).

5 5. CPT mailed 2,737 Postcard Notices. Out of these, 288 were returned. We
6 attempted to skip trace 285 out of the 288 Settlement Class Members, and successfully remailed
7 142 Postcard Notices. The 3 remaining will be skip traced this week and promptly remailed if
8 new addresses are obtained. Despite our reasonable efforts, skip trace did not return a better
9 address for the remaining 146 addressees of Postcard Notices, therefore they could not be
10 remailed.

11 6. Based on the number of Email Notices and Postcard Notices transmitted and the
12 numbers that were undelivered or undeliverable, we estimate that approximately 95% of
13 Settlement Class Members have received individual notice of the Amended Settlement
14 Agreement in the form of Postcard Notice. We also estimate that approximately 61% of
15 Settlement Class Members have received *both* an Email Notice *and* a Postcard Notice.

16 7. We have also established and administered the dedicated Settlement Website and
17 24-hour, toll-free support line described in my earlier declaration.

18 8. Although we have received no opt-out requests from Settlement Class Members,
19 we will inform the parties if we receive any such requests on or before the November 21, 2025
20 deadline.

21 9. At Class Counsel's request, we have also transmitted email reminders and
22 postcard reminders to Settlement Class Members. We transmitted the email reminders on
23 November 14, 2025, and mailed the postcard reminders on November 14, 2025.

24 10. CPT estimates its costs for the notice and administration of this Settlement—
25 including the transmission of the email and postcard reminders—to be approximately \$34,000.
26 CPT understands that the costs related to administration will be paid from the Settlement Fund.

11. As I opined in my previous declaration, the Notice Plan implemented by CPT has been consistent with other court-approved notice programs, has provided Settlement Class Members with notice of their legal rights, and has comported with due process requirements.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 14th day of November, 2025, at Irvine, California.

Julie N. Green
JULIE N. GREEN

Exhibit D

Important Reminder

This is a reminder that if you were treated at the Puyallup Good Samaritan Hospital's emergency department in 2017–2018 and received a letter in 2018 advising you to be tested for hepatitis C, ***you are entitled to receive over \$800*** from this class action settlement.

Please visit <http://www.multicarehealthsettlement.com/Login>, and use the CPT ID and Passcode located on the front of this notice to log in and answer a few simple questions.

This process is easy, secure, will ensure you will receive your payment, and **shouldn't take you more than 5 minutes to complete—maybe even less**. There is currently a **December 19 deadline** for you to complete this process, **so please don't delay**.

Again, if you are a class member, you are entitled to receive over \$800.

Other options: You have the right to exclude yourself from this settlement. If you do that, you won't receive any payment but won't be bound by the settlement and any final judgment in this action. You also have the right to object to the settlement and still receive payment. You must exclude yourself or object by November 21. For complete information about all of your rights and options and how to exercise them, see the **Long-Form Notice** document at <https://www.multicarehealthsettlement.com/Documents>, or call **1-888-812-1927**.

PLACE
STAMP
HERE

M.N. v. MultiCare Health System, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

PRESORTED
First Class
U.S. Postage
PAID

Court Approved Legal Notice

No. 18-2-08055-5

Pierce County Superior Court

If you received a notice in April 2018 from Puyallup Good Samaritan Hospital advising you to be tested for hepatitis C, you are eligible for over \$800 from a class action settlement.

A court has authorized this Notice.
This is not a solicitation from a lawyer.

Para la notificación en español, visite nuestro sitio web, **www.MulticareHealthSettlement.com**.

M.N. v. MultiCare Health System, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

RETURN SERVICE REQUESTED

CPT ID: «ID»
Passcode: «Passcode»
«FullName»
«Address1» «Address2»
«City», «State» «Zip»

Scan this code to visit the settlement website at www.MulticareHealthSettlement.com:



CHANGE OF ADDRESS FORM

Please provide your correct name and current address (if different)
here and return the postcard.

This updated information will be verified.

***THIS SUBMISSION IS ONLY FOR AN ADDRESS UPDATE.
IT DOES NOT CONSTITUTE A SUBMISSION OF A CLAIM.***

CPT ID: «ID»
Former Name _____
New Name _____
Address _____
City, State, Zip _____

Exhibit E

To: <<Email>>

From: MulticareHealthSettlement@cptgroup.com

Subject: Puyallup Good Samaritan Hospital Class Action Settlement – REMINDER

CPT ID: «ID»

Passcode: «Passcode»

This is a reminder that if you were treated at the Puyallup Good Samaritan Hospital's emergency department in 2017–2018 and received a letter in 2018 advising you to be tested for hepatitis C, ***you are entitled to receive over \$800*** from this class action settlement.

Please visit <http://www.multicarehealthsettlement.com/Login>, and use the CPT ID and Passcode listed above to log in and answer a few simple questions.

This process is easy, secure, will ensure you receive your payment, and *shouldn't take you more than 5 minutes to complete—maybe even less.* There is a **December 19 deadline for you to complete this process, so please don't delay.**

Again, if you are a class member, you are entitled to receive over \$800.

This is a court-approved legal notice concerning *M.N. v. MultiCare Health Systems, Inc.*, a class action pending in the Superior Court for Pierce County, Washington. It is not a solicitation from a lawyer.

Para la notificación en español, visite nuestro sitio web.

You have the right to exclude yourself from this settlement. If you do that, you won't receive any payment but won't be bound by the settlement and any final judgment in this action. You also have the right to object to the settlement and still receive payment. You must exclude yourself or object by November 21. For complete information about all of your rights and options and how to exercise them, see the Long-Form Notice document at <https://www.multicarehealthsettlement.com/Documents>, or call **1-888-812-1927**.