

This is a court-approved legal notice.

M.N. et al. v. MultiCare Health System, Inc., No. 18-2-08055-5 (Pierce County Superior Court)

PUYALLUP GOOD SAMARITAN HOSPITAL CLASS ACTION SETTLEMENT

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 eligible for payment from this class action settlement. This payment is likely to be hundreds of dollars per class member.

A class action settlement has been proposed in a lawsuit against MultiCare Health System, Inc., who operates the Good Samaritan Hospital in Puyallup. During parts of 2017 and 2018, a nurse at the Hospital diverted injectable drugs for her personal use. Because the nurse became infected with hepatitis C at some point during this period, MultiCare sent a letter to about 2,800 patients who had been treated at the Hospital, advising them to be tested for hepatitis B, hepatitis C, and HIV. There's a copy of that form letter at the end of this notice. If you received that letter, you can get paid from the proposed settlement.

Here are the most important things to know:

- Three patients—called “class representatives”—sued MultiCare, alleging that MultiCare failed to exercise the degree of care expected of a reasonably prudent hospital and that this failure made it possible for the nurse to divert drugs. MultiCare denies the allegations in the lawsuit. The Court hasn't decided which side is right or wrong. To avoid the expense and risks associated with further litigation, the parties have agreed to a settlement. If the settlement is approved by the Court and becomes final, it will resolve all claims pending in the lawsuit.
- The Court found that this lawsuit could proceed as a class action on behalf of two classes of Plaintiffs. The first class consists of patients who received certain injectable drugs in the emergency department and were treated directly by the nurse who diverted drugs. The second class consists of other patients who received those same drugs and were treated in the Emergency Department while the nurse who diverted the drugs was on duty.
- **To receive payment, you need to go to www.MulticareHealthSettlement.com and enter some very simple information—it probably won't take you more than a few minutes.** If you do that, and if the proposed settlement becomes final, settlement checks will be mailed to you. The settlement website also allows you to choose to receive your payment electronically rather than by check—you just need to give the settlement administrator the information it needs to pay you electronically. Go to **www.MulticareHealthSettlement.com**.
- Under the proposed settlement, MultiCare will pay \$4 million into a settlement fund. The settlement fund will be used to pay class members after deducting administrative costs, attorneys' fees and expenses, service awards for the people who represented the classes, taxes and tax expenses, and any other Court-approved deductions. Our current estimate of the payment for each class member is **\$830**, but keep in mind that's just an estimate.
- The lawyers who brought this lawsuit (“Class Counsel”) will ask the Court for payment of attorneys' fees from the settlement fund as compensation for investigating the facts, litigating the case, and negotiating the settlement, and will ask to be reimbursed for their expenses. They will also ask for service awards for the Class Representatives to compensate them for taking on this litigation on behalf of the classes.

Questions? Go to www.MulticareHealthSettlement.com or call 1-888-812-1927.

- Before this settlement can go into effect, the Court has to approve it as fair, reasonable, and adequate to the settlement classes. On December 19, 2025, at 9:00 a.m., the Court will hold a final approval hearing to determine: (1) whether the settlement is fair, reasonable, and adequate and should receive final approval; (2) whether the application for an award of attorneys’ fees and expenses brought by Class Counsel should be granted; and (3) whether the application for service awards to the plaintiffs who brought the lawsuit and were appointed as class representatives should be granted. The hearing date and time may change without further notice to you and/or the hearing may be held remotely or telephonically. Check **www.MulticareHealthSettlement.com** for updates or changes.
- You have the right to object to or comment on the settlement. See Question 14 below.

YOUR LEGAL RIGHTS AND OPTIONS		
Option	What will happen	Relevant date
SUBMIT YOUR PAYMENT INFORMATION	Receive a payment if you’re in one of the classes. See Questions 10 and 11 for details.	You must submit your payment information by December 19, 2025.
EXCLUDE YOURSELF FROM THE SETTLEMENT	You can exclude yourself from the settlement by informing the settlement Administrator that you want to “opt out” of the settlement. If you opt out, you won’t receive money under the settlement. But you will retain your right to separately sue MultiCare at your own expense over the same claims as are in this lawsuit. For details, see Question 13 below.	You must submit your request for exclusion by November 21, 2025.
OBJECT TO OR COMMENT ON THE SETTLEMENT	You can object to or comment on the settlement if you’re a settlement class member. Even if you object, you’ll still receive a payment if the settlement becomes final. For details, see Question 14 below.	You must submit your objection or comment by November 21, 2025.

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BASIC INFORMATION AND OVERVIEW

1. What is this notice, and why did I get it?

The Court authorized this notice to tell you about how the proposed settlement may affect you. This notice describes the lawsuit, the general terms of the proposed settlement, and what it may mean for you. This notice also explains how to participate in, or exclude yourself from, the settlement.

To make sure you're a member of one of the two classes here, and therefore eligible for benefits under this settlement, see Question 7.

2. What is this lawsuit about?

In parts of 2017 and 2018, a nurse working in the emergency department of the Puyallup Good Samaritan Hospital diverted injectable narcotics for personal use. In 2018, after learning that two patients treated at the emergency department tested positive for hepatitis C, MultiCare and public health officials investigated and determined that a small number of patients had contracted hepatitis C from the nurse. These patients aren't part of this lawsuit.

MultiCare then sent a notification letter to 2,800 persons who had received certain injected medications in the Hospital emergency department while the nurse was on duty for a seven-month period. This number included both patients that the nurse had directly treated and patients she had not directly treated. An identical letter was sent to all such patients, and it informed them to get their blood tested to make sure they were not infected by hepatitis C. In this notice, these letters will be referred to as the "Notification Letters."

As far as the parties are aware, no one in either of the two classes has tested positive for hepatitis C. (For who is in the two classes, see Questions 3 and 7.)

In 2018, the Plaintiffs representing the classes filed this lawsuit on behalf of themselves and similarly situated patients. They asserted claims for medical negligence and corporate negligence and sought damages for the emotional distress they had suffered after learning of the hepatitis C outbreak at the Hospital.

3. What is a class action, and is this lawsuit one?

In a class action, one or more people called "class representatives" sue on behalf of themselves and other people with similar claims. All of these people together are the "class" or "class members." Because this is a class action settlement, even persons who did not file their own lawsuit can obtain benefits provided under the settlement, except for those individuals who exclude themselves from the settlement classes by the deadline.

There are two separate classes of Plaintiffs. The first class, called the "Weberg Treatment Settlement Class" after the last name of the nurse who diverted drugs, consists of everyone who was treated directly by the nurse and received Notification Letters. The second class, called the "General Treatment Settlement Class," consists of everyone who was treated at the Puyallup Good Samaritan emergency department while the relevant nurse was on duty, but who didn't receive treatment directly from the nurse, and who then received Notification Letters.

4. Why is there a settlement?

The Court has not decided in favor of either side. Instead, both sides agreed to a settlement after approximately two years of litigation at the trial-court level, a partial dismissal of the Plaintiffs' claims, an appeal, and further litigation before the trial court after the appeal. The parties agreed to a settlement after a lengthy mediation process overseen by a neutral mediator. Settlements avoid the costs and uncertainty of a trial and further appeals, while

more quickly providing benefits to members of the settlement class. The class representatives appointed to represent the classes and Class Counsel (see Question 16) believe that the settlement is in the best interests of the settlement class members.

5. Didn't I already receive a notice about this lawsuit?

Yes, back in 2020 you probably received **class notice**. A **class notice** is a notice that a court has decided a case should proceed as a class action and is different from this notice. This notice is a **settlement notice**. In some ways it resembles the class notice, but it contains information about the proposed settlement that has now been reached.

6. Is this settlement final? If not, what has to happen for it to go into effect?

When the parties in a class action want to settle, they must seek the court's approval before the settlement can become effective. The court will approve the proposed settlement here only if—after examining the proposed settlement—it determines that the settlement is fair, adequate, and reasonable to the settlement class members.

WHO IS PART OF THE SETTLEMENT

7. How do I know if I am part of the settlement?

If you already received the class notice and did not exercise the option to exclude yourself at that time, you are likely a settlement class member. Under the proposed settlement, a settlement class member is defined as member of the Weberg Treatment Settlement Class or the General Treatment Settlement Class.

You're a member of the Weberg Treatment Settlement Class if you were treated at the Puyallup Good Samaritan Hospital between August 4, 2017, and March 23, 2018, received care from Cora Weberg (the nurse who diverted drugs), and received Notification Letters in 2018 from MultiCare.

You're a member of the General Treatment Settlement Class if you were treated at the Puyallup Good Samaritan Hospital between August 4, 2017, and March 23, 2018, and received Notification Letters in 2018 from MultiCare, but didn't receive care directly from Cora Weberg.

To be a member of either of these classes, and to receive payment from the proposed settlement, you **do not need to have retained** a copy of the Notification Letter you received in 2018.

Excluded from the settlement are:

- The small number of people (approximately 15) who have entered into an individual settlement with MultiCare that settled claims involved in this lawsuit;
- Officers and directors of MultiCare;
- The presiding judge and any judicial staff involved in this lawsuit; and
- Any Class Member who has already opted out or who now opts out (see Question 13).

THE SETTLEMENT BENEFITS

8. What does the settlement provide?

MultiCare will pay \$4,000,000 into a settlement fund. The settlement fund will be used to:

- Make payments to settlement class members;
- Pay the costs of notifying settlement class members and administering the settlement;
- Pay service awards to the class representatives, if and as approved by the Court (see Question 18);
- Pay attorneys' fees, costs, and expenses, if and as approved by the Court (see Question 17).

9. How much can I expect to receive in payment from the settlement fund?

Each settlement class member will receive an equal payment out of the settlement fund. That means that what you'll receive—if you don't exclude yourself from the settlement—will be determined by the following formula:

$$\begin{array}{l} \text{\$4 million settlement fund} \\ \text{minus service awards} \\ \text{minus fees, costs, and expenses approved by the court} \end{array} \div \begin{array}{l} \text{Approximately} \\ \text{2,750} \\ \text{total class members} \end{array}$$

Right now, we don't know exactly how much it will cost to provide notice and administer the settlement. Nor can we know what the Court will decide to award in service fees to the class representatives, or in attorneys' fees or costs. That means that right now we can provide only an approximate estimate, which is \$830 based on the information currently available.

HOW TO GET SETTLEMENT BENEFITS

10. What do I need to do to get a payment out of the settlement fund?

The IRS requires the settlement administrator to collect your social security number before it can pay you out of the settlement fund. MultiCare is prohibited by health privacy laws from sharing your social security number with the settlement administrator.

So, to receive your payment, please go to the official settlement website at **www.MulticareHealthSettlement.com**, enter your CPT ID and Passcode, which will be on the postcard notice you receive about this settlement, and then follow the instructions and enter the information required, including your social security number. This shouldn't take you more than a few minutes. Your social security number will be kept secure, will not be shared with anyone, and your data will be destroyed once the settlement has been implemented.

The settlement website will also allow you to update your address to ensure that your settlement check is mailed to the right place.

If you don't go the official settlement website and enter the information required by **December 19, 2025**, you will be deemed to have waived your right to payment from the settlement fund.

11. I'd prefer not to receive my payment in the form of a check. Is there some other way I can be paid?

Yes. If you prefer, you can receive your payment electronically through Zelle, PayPal, ACH, or Venmo. To receive payment electronically, however, you must let the settlement administrator know. To inform the settlement administrator that you want to be paid electronically, and to give the settlement administrator the information it needs to know about your electronic payment account, you must go to **www.MulticareHealthSettlement.com** and follow the instructions there.

YOUR RIGHTS AND OPTIONS

12. Do I need to do anything to receive a payment from the settlement?

Yes, please go to the official settlement website at **www.MulticareHealthSettlement.com** and follow the instructions there. It probably won't take you more than a few minutes, and it's the only way to receive the hundreds of dollars you are eligible to receive from the settlement fund. See Question 10 above.

If you received the class notice in 2020 and previously excluded yourself by the applicable deadline, you are not a member of either of the settlement classes and will not receive any settlement payment from the settlement. See Question 5 for a discussion of that earlier notice.

13. How do I exclude myself from the settlement?

If you're a settlement class member but do not want to remain in the class, you may exclude yourself from the class (also known as "opting out"). If you exclude yourself, you'll lose any rights you have under the settlement, including the right to be paid from the settlement fund.

If you decide on this option, you will retain any rights you may have against MultiCare and may file your own lawsuit against MultiCare based on the same factual allegations that are asserted in this lawsuit, but if you choose to do so you will have to do it at your own expense. That means you will either have to represent yourself in court or find your own attorney at your own cost to represent you. If you are considering this option, you may want to consult an attorney as soon as possible to get advice.

If you don't opt out, and the settlement becomes final, you will be bound by it, including the judgment entered in accordance with the settlement. For what it means to be "bound" by the settlement, see Question 15.

To opt out, you must send a request to opt out to the settlement administrator. A printable form for opting out is available on the settlement website at **www.MulticareHealthSettlement.com**. Any request to opt out must: (1) identify the case name of this lawsuit; (2) identify the name and current address of the person seeking to opt out from the settlement; (3) be personally signed by the person seeking to opt out; (4) include a statement clearly indicating the person's intent to be excluded from the settlement; and (5) request exclusion only for the person whose personal signature appears on the request.

To validly and properly opt out, you must mail your request to opt out to the following address, postmarked no later than **November 21, 2025**:

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

14. How do I comment on or object to the settlement or to Class Counsel’s request for attorneys’ fees, litigation expenses, and service awards?

If you’re a settlement class member and do not opt out, you can comment on or object to the settlement or to Class Counsel’s request for attorneys’ fees, litigation expenses, and service awards. To object or comment, you must send a signed, written objection or comment. It must include:

- the case name and number of this lawsuit, *M.N. et al. v. MultiCare Health System, Inc.*, No. 18-2-08055-5;
- the full name, address, telephone number, and email address of the objecting settlement class member and, if represented by counsel, of his/her counsel;
- a statement of whether the objection applies only to the objector, to a specific part of the settlement classes, or to the settlement classes as a whole;
- a statement of the number of times in which the objector (and, where applicable, objector’s counsel) has objected to a class action settlement, along with the caption of each case in which the objector has made such objection;
- a statement whether the objector has sold or otherwise transferred the right to their recovery in this Action to another person or entity, and, if so, the identity of that person or entity;
- a statement of the specific grounds for the objection, including any legal and factual support and any evidence in support of the objection;
- a statement of whether the objecting settlement class member intends to appear at the hearing on whether the Court will give final approval to the settlement on **December 19, 2025**, and if so, whether personally or through legal counsel; and the objector’s signature.

To be considered by the Court, your comment or objection must be filed with the Court or mailed to the Clerk of Court, and filed or postmarked (as the case may be) no later than **November 21, 2025**. If you choose to mail your comment or objection rather than file it with the Court, you must mail it to both the Clerk of Court and to the settlement administrator at the addresses listed below:

Clerk of Court	Settlement Administrator
Clerk of Pierce County Superior Court 930 Tacoma Ave. S., Room 110 Tacoma, WA 98202	<i>M.N. v MultiCare Health System, Inc.</i> c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606

15. What claims are released by the settlement?

In exchange for the settlement benefits, you will release (give up) all claims that were asserted in this lawsuit, plus any claims that could have been asserted based on the same underlying allegations of this lawsuit.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes. The Court appointed the following attorneys to represent you and other settlement class members as “Class Counsel.”

Cari Campen Laufenberg
Mark D. Samson
Benjamin Gould
KELLER ROHRBACK L.L.P.
1201 3rd Avenue, Suite 3400
Seattle, WA 98101
(206) 623-1900

You will not be charged by these lawyers for their work on the case, because any fees they receive must come from the settlement fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will these lawyers be paid?

Class Counsel have undertaken this case on a contingency-fee basis. That means they haven’t been paid any money for their work on this case. It also means they’ve paid all of the case legal expenses—for example, filing fees, expert witness fees, and the costs of recording and transcribing deposition testimony. Class Counsel will ask the Court to award them attorneys’ fees of up to 33% of the settlement fund and reimbursement for expenses to be paid from the settlement fund. Any fees and expenses that Class Counsel receive must be approved by the Court, which will also decide their amount, if any. You won’t have to separately pay any portion of these fees and expenses yourself. Class Counsel’s formal motion for fees and expenses will be filed by **October 10, 2025**, and will be available to view on the settlement website at **www.MulticareHealthSettlement.com**.

18. Will the class representatives receive any additional money?

Class Counsel will ask the Court to award the three class representatives service awards of \$5,000 each for the time that they spent, and the risks that they undertook, in bringing this lawsuit on behalf of the class. Any service awards that the class representatives receive must be approved by the Court, which will also decide their amount, if any. Any amount approved by the Court will be paid from the settlement fund.

GETTING MORE INFORMATION

19. Where can I get more information?

You can also contact the settlement administrator at 1-888-812-1927, emailing MulticareHealthSettlement@cptgroup.com, or by mailing a letter to *M.N. v MultiCare Health System, Inc.* c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606, for more information or to request that a copy of this document be sent to you in the mail. If you wish to communicate directly with Class Counsel, you may contact them (contact information above in Question 16). You may also seek advice and guidance from your own private lawyer at your own expense, if you wish to do so.

This notice is only a summary of the lawsuit and the settlement. Other related documents can be accessed through the settlement website. If you have questions about the proposed settlement, or wish to receive a copy of the settlement agreement but can’t download or access the copy online, you may contact the settlement administrator. The Court cannot respond to any questions regarding this notice, the lawsuit, or the proposed settlement.

Please do not contact the Court, its Clerks, or MultiCare.

Questions? Go to www.MulticareHealthSettlement.com or call 1-888-812-1927.