

ATTENTION:

Were you enrolled with Unity Healthshare through The Alera Companies?

If so, this notice provides important information about your rights.

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

- Individuals who enrolled in Unity Healthshare through The Alera Companies filed three separate class action lawsuits against Unity Healthshare (now known as OneShare LLC), The Alera Companies, Inc., and Trinity Healthshare, Inc. The individuals who filed the lawsuits are known as “Plaintiffs.”
- The lawsuits alleged, in part, that Unity Healthshare, Trinity Healthshare and The Alera Companies sold unauthorized health insurance to their members.
- Trinity Healthshare and The Alera Companies are now in bankruptcy and their assets will be liquidated. Any recovery for creditors and members of these companies will be addressed in the bankruptcy process.
- The Plaintiffs have reached a settlement agreement with OneShare to resolve the claims against the company related to the time that the Unity/Alera plans were sold (October 31, 2016 to August 11, 2018).
- The Court has preliminarily approved the settlement agreement and certified a settlement class. Your legal rights are affected, and you have a choice to make now:

Your Legal Rights In This Settlement	
You may comment on or object to the proposed Settlement	<p>You have the right to comment on, object to or support the proposed Settlement. The Court will decide whether to approve or reject the proposed Agreement after a Final Hearing currently scheduled for January 11, 2024 at 2:00 p.m. at the United States Courthouse, 501 I Street, Sacramento, CA 95814, Courtroom 2, 15th Floor.</p> <p>You may submit written comments or objections that you wish to be considered by the Court no later than November 12, 2023. You should not call the Court.</p>
You may make a claim	<p>You may submit a claim if you qualify as a Class Member for either: (1) the total paid monthly payments to Unity/Alera or (2) the unpaid medical expenses incurred while you were enrolled with Unity/Alera. Claims must be submitted by November 12, 2023. A claim form is included with this notice.</p>
You may do nothing	<p>By doing nothing, you get no financial benefit from this lawsuit and you give up any rights to sue OneShare separately about the same legal claims in this lawsuit or other claims that could have been brought.</p>

Questions? Visit <https://www.symslaw.com/unitysettlement> or email unitysettlement@syllaw.com

You may ask to be excluded.

If you ask to be excluded, you will not benefit from this settlement. But you keep any right to sue OneShare separately about the same legal claims in this lawsuit.

FREQUENTLY ASKED QUESTIONS

1. Why did I get this notice?

You are receiving this notice because the records maintained by The Alera Companies indicate that you were enrolled with Alera and Unity Healthshare between October 31, 2016 to August 11, 2018. **You are not a Class Member simply because you got this notice.**

This notice explains that the Court has preliminarily approved a settlement in a class action lawsuit that may affect you. Judge Troy L. Nunley of the United States District Court for the Eastern District of California is overseeing this class action. The lawsuit is known as *Duncan et al. v. The Alera Companies, et al.*, Case No. 2:20-CV-00867-TLN-KJN.

Only individuals who meet the following definition of a class member are in the class:

All individuals who purchased a plan from both Alera Healthcare, Inc. and Unity Healthshare LLC at any time on or before August 10, 2018.

2. What is a class action, and who is involved?

In a class action lawsuit, individuals called “Named Plaintiffs” or “Class Representatives” sue individuals or entities (called “Defendants”) on behalf of themselves and others who may have a similar claim. In a Class Action lawsuit, one Court makes decisions on behalf of everyone in the Class—except for those people who choose to exclude themselves from the Class. Lawyers from five different law firms represent the Class, including Sirianni Youtz Spoonemore Hamburger. Class counsel can be reached at <https://www.symslaw.com/unitysettlement>.

3. What is this lawsuit about?

In this lawsuit, the Named Plaintiffs claim that Defendants marketed, sold, and administered unauthorized and illegal health insurance and misrepresented the coverage and benefits to be provided pursuant to the health plans sold. Defendants deny those claims and allege that their conduct was lawful.

4. What does the proposed Settlement Agreement Provide?

The main points of the Settlement are described below. You can read the entire Settlement at <https://www.symslaw.com/unitysettlement>. The Settlement is not final until the Court approves the Settlement after the Final Hearing.

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- OneShare must pay \$3 million into a Settlement Trust Account by March 31, 2023. OneShare has already done so.
- OneShare must assign to the Class all payments to which it is entitled in the *Aliera* bankruptcy. OneShare has filed a \$3.75 million proof of claim, and Plaintiffs expect a portion of that claim will be paid.
- OneShare must make timely additional payments to the Settlement Trust Account. At a minimum, OneShare must pay at least \$400,000 per year. If OneShare pays an additional \$3 million to the Trust Account by December 31, 2024, it will not be required to make additional payments.
- If OneShare does not complete the \$3 million in payments by December 31, 2024, the amount OneShare must pay to the Settlement Trust Account increases, the longer it takes to make the payments. If OneShare does not complete its payments until December 31, 2031, it will be required to pay an additional \$7 million. Thus, the Settlement Agreement imposes a financial incentive on OneShare for early payment.
- Class members will release any claims against OneShare that were brought or could have been brought in the lawsuit. Claims against the companies in bankruptcy or the insiders of *Aliera* are not released.
- Class counsel will seek reimbursement of litigation costs and payment of attorneys fees of up to 28% of the Settlement Fund.
- Named Plaintiffs may be awarded an additional service award of \$10,000 each for the time and effort they spent advancing claims for the class.

5. When Will the Funds from the Settlement Trust Account Be Available?

The Court must finally approve the Settlement, and, if any Class Member appeals, a final decision on any appeal(s) must be made before funds are available.

Plaintiffs do not anticipate making payments before December 31, 2024. If OneShare completes its payments to the Settlement Trust Account by that date, Plaintiffs' counsel anticipate that all valid and approved claims can be paid at their *pro rata* amount within 90 days of that date.

If OneShare does not complete its payments by December 31, 2024, Plaintiffs' Counsel will report to the Court as to the proposed timing for payment of claims.

Plaintiffs do not expect that claims will be paid in full. However, the claims in this case will be coordinated with members' claims in the two bankruptcies, which may provide additional compensation for class members. You may receive a separate mailing about the *Aliera* bankruptcy.

6. What are my rights and options?

- **You May Comment on, Object to, or Support the Proposed Settlement.**

The Court will hold a hearing on the proposed Agreement to consider comments and approve or reject the Agreement.

Questions? Visit <https://www.symslaw.com/unitysettlement> or email unitysettlement@syllaw.com

- The Court currently has scheduled a hearing for January 11, 2024 at 2:00 p.m. The hearing will be located at United States Courthouse, 501 I Street, Sacramento, CA 95814, Courtroom 2, 15th Floor.
- The hearing date, time, and location can change without further notice. Please contact Class Counsel if you want to confirm the date and time of the hearing as that date approaches.

All comments on the Agreement must be submitted in advance to the address listed below. You are not required to submit comments or attend the hearing.

You may attend the hearing and may choose to bring a legal representative if you wish and at your own expense. You must tell the Court if you plan to come to the hearing to object to, comment on, or formally support the Agreement by November 12, 2023.

If you choose to submit written comments or appear at the Court hearing, your letter must be received no later than November 12, 2023, and must be mailed to:

Duncan v. Alier Settlement Hearing
United States Courthouse
501 I Street
Sacramento, CA 95814

All communications with the Court must be in writing, and Class Members should not attempt to call the Court.

◆ **You may ask to be excluded.**

If you want to file your own case against Defendant OneShare, or continue one you already have begun, you need to exclude yourself from the Class. If you exclude yourself from the Class you won't get any money from this settlement. However, you may then be able to sue or continue to sue Defendant for claims that were brought or could have been brought in this case. If you start your own lawsuit against Defendant after you exclude yourself, you will have to hire and pay your own lawyer for that lawsuit, and you will have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations or other restrictions.

- **You may submit a claim.**

IF YOU WANT TO RECEIVE A FINANCIAL BENEFIT FROM THIS SETTLEMENT AGREEMENT, YOU MUST SUBMIT A CLAIM. You can submit a claim for either: (1) the total paid monthly amounts you paid to Unity/Alier or (2) the unpaid medical expenses incurred while you were enrolled with Unity/Alier. Claims must be submitted by November 12, 2023. A claim form and claim instructions are included with this notice. If you do not timely submit a claim, you will not receive any financial benefit from this settlement agreement.

7. How do I opt out of the Class?

To exclude yourself from this case, you must mail an "Exclusion Request" in the form of a letter stating that you want to be excluded from *Duncan v. Alier*. Be sure to include your name and address and sign the letter. You must mail your Exclusion Request so that it is received by November 12, 2023, to: *Duncan v. Alier*, Exclusion Request, c/o BMC Group, PO Box 90100, Los Angeles, CA 90009.