

HealthExtras Settlement Administrator
c/o Heffler Claims Group
P.O. Box 60167
Philadelphia, PA 19102

POSTAGE

If you were a member of an insurance plan that was endorsed by Christopher Reeve, and included disability, accident, sickness, or travel insurance, and was sometimes offered as

<<Barcode>>

Class Member ID: 30887A1B2C3D4

-
- **the HealthExtras Catastrophic Accidental Disability Program,**
 - **the HealthExtras Benefits Program,**
 - **the American Express Accidental Disability Plan,**
 - **the Catastrophic Accident Plan, or**
 - **the Accident Protection Plan,**

Class Member Name

Address

City, ST Zip

a class action settlement may affect you.

[BARCODE AREA]

A proposed nationwide class settlement has been reached in *Gierczyk v. National Union Fire Insurance Company of Pittsburgh, PA et al.*, Case No. 2:13-cv-06272-FSH-MAH. The settlement resolves all claims involving the sale or underwriting of allegedly invalid or illegal insurance covering members of certain benefits programs (the “Benefits Programs”), including (1) the “HealthExtras Catastrophic Accidental Disability Program,” the “HealthExtras Benefits Program,” the “American Express Accident Disability Plan,” the “Catastrophic Accident Plan,” and the “Accident Protection Plan,” as well as (2) any benefits program or memberships offering any type of disability, dismemberment, casualty, emergency accident and sickness medical expense benefit, or travel insurance marketed or administered by HealthExtras, J.C. Penny Life Insurance Company, Stonebridge Life Insurance Company, or American Express Travel Related Services Company, Inc., among other financial institutions, or (3) that used the trade name “HealthExtras,” including any such program endorsed by Christopher Reeve, provided, however, that “Benefits Program” does not include benefits programs or memberships received as an employee of HealthExtras, Inc. or Catalyst Health Solutions, Inc.

The defendants involved in the settlement are: HealthExtras, Inc., HealthExtras, LLC, Catalyst Health Solutions, Inc., HealthExtras Insurance Agency, Inc., Catamaran Health Solutions, LLC, National Union Fire Insurance Company of Pittsburgh, Pa., American International Group, Inc., AIG Group Insurance Trust, Virginia Surety Company, Inc., Alliant Insurance Services, Inc., Alliant Insurance Services Houston, LLC, and Alliant Services Houston, Inc. (“Defendants”). Plaintiffs claim that these Defendants (1) were responsible for selling and underwriting group insurance to consumers who allegedly were not members of a group eligible under state law to receive such insurance; (2) falsely and deceptively advertised such insurance; and (3) collected excessive premiums or fees.

If you paid for memberships or received any benefits from any

Benefits Programs at any point between 1999 and 2014, you may be a Class Member. The Defendants have agreed to provide a settlement fund of \$15 million, which, after deduction of attorneys’ fees not to exceed \$5 million, expenses, administration costs, and case contribution awards to certain named plaintiffs not to exceed \$85,000 total, will be divided between two groups, depending on which insurers underwrote a member’s disability coverage—the “HealthExtras Settlement Class” and the “Stonebridge Settlement Class”—and then proportionately distributed to members of the separate settlement classes who submit valid and timely claims.

To receive a payment, you must complete and submit a Claim Form by March 31, 2017. You can exclude yourself from this settlement by March 10, 2017 to give up a payment but keep your right to sue Defendants regarding these claims. You can also object to any part of the settlement by March 10, 2017 if you do not exclude yourself from the settlement. If you do nothing, you will not receive a payment, but you will be bound by the decision of the Court and will give up your rights to sue about these claims. Complete information on how to file a claim, exclude yourself, or object, is on the settlement website at www.HealthExtrasSettlement.com.

The Court is scheduled to hold a Final Approval Hearing at 2:00 p.m., on April 20, 2017, in the Courtroom MLK 2A at 50 Walnut Street in Newark, New Jersey 07101, to consider whether the settlement is fair, reasonable, and adequate, any objections, and whether to approve the settlement. You may attend the hearing, but you do not have to. The Court may also decide to approve attorneys’ fees, costs and case contribution awards. The motion for these expenses will be posted on the settlement website after it is filed. If the hearing is rescheduled, the new date and time will be available on the settlement website.

This is only a summary. For more information, visit the settlement website or call 1-844-245-3767. Please do not contact the Court.

www.HealthExtrasSettlement.com