

**United Food & Commercial Workers Local Union #1189
and St. Paul Food Employers Health Care Plan**

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Wilson-McShane Corporation
Fund Administrators

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RE: CLASS ACTION SETTLEMENT: BLUE CROSS AND BLUE SHIELD OF MINNESOTA

Dear Participant:

We are writing to all United Food and Commercial Workers Local 1189 and St. Paul Food Employers Health Care Plan (“Fund”) participants because you may have recently received communications from claim administrators, law firms, or other persons about a class action lawsuit involving the Blue Cross Blue Shield Association and related companies (including Blue Cross and Blue Shield of Minnesota) (collectively, “Blue Cross”).

This lawsuit, *In re: Blue Cross Blue Shield Antitrust Litigation*, is currently pending in federal court and involves claims that Blue Cross violated business competition laws in the health insurance and benefits administration industry.

The parties to this lawsuit have proposed a Settlement Agreement, which would allow affected self-funded group health plans (such as the Fund) and individual participants in those plans to claim financial compensation if they were covered by a Blue Cross plan—or, like the Fund, had administrative services provided by Blue Cross—during the period from September 1, 2015 through October 16, 2020. (Other time periods apply to individuals who had different insurance coverage through Blue Cross, but not all insurance plans are covered by the settlement, such as Medicare Advantage insurance plans.)

The Trustees are currently analyzing the Fund’s legal options in this matter, which may include filing a claim under the Settlement Agreement on behalf of the Fund. Individual participants covered by the Fund at any time during the period noted above may also be eligible to file their own claims.

The court has appointed a Claims Administrator to oversee the claims process for this settlement. The amount of compensation that the Fund or individual participants could receive under the settlement is currently unknown and depends on the total number of claims. The allocation of settlement funds between the Fund and individual participants also is currently unknown. Claims may be based on a “default” percentage of the settlement proceeds or an individualized amount, reflecting the source of funds paid to Blue Cross (for example, self-payments versus employer contributions). The Claims Administrator has the power to make these determinations, and the court has the ultimate authority to approve the final settlement.

We encourage you to carefully consider your individual options in this matter. Keep in mind that you have your own rights when it comes to class action lawsuits. The settlement class as a whole is represented by a group of attorneys, but you also have the right to consult your own legal advisor.

More information about this lawsuit, the proposed settlement, and the claims process (including important deadlines) can be found at <https://www.bcbssettlement.com>.

Sincerely,

The Board of the Trustees of the United Food and Commercial Workers Local 1189 and St. Paul Food Employers Health Care Plan