



**There is a proposed settlement (“Settlement”) with CareFirst in the Action.** The Action and Settlement involve health care coverage for comprehensive breastfeeding and lactation support and counseling services (“CLS”), a mandated preventive health benefit under the Patient Protection and Affordable Care Act (the “ACA”). The Settlement will resolve a lawsuit over whether CareFirst violated federal law and the terms of its sponsored and administered health plans with respect to coverage and adjudication of claims for CLS. CareFirst denies all of the Plaintiffs’ claims, but has agreed to the Settlement to resolve the Action.

**IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT. UNDER THE SETTLEMENT, CLASS MEMBERS WILL RELEASE ALL LEGAL CLAIMS THEY MAY HAVE AGAINST CAREFIRST RELATING TO COVERAGE FOR CLS RECEIVED BETWEEN AUGUST 1, 2012 AND AUGUST 31, 2018.**

**THIS NOTICE IS JUST A SUMMARY. YOU MUST READ IN FULL THE NOTICE OF PROPOSED CLASS ACTION SETTLEMENT.** The Notice and Stipulation describe the benefits of the Settlement, including cash payments to Class members for Authorized CLS Claims. If you did not receive a Notice and a Claims Data Form, in order to receive any cash payment in the Settlement you must establish your rights by submitting a Proof of Claim postmarked on or before **July 8, 2019**. Your failure to timely submit your Proof of Claim with supporting documentation and any required affirmation that CLS was received, will preclude you from receiving any payment in connection with the Settlement. If you are a Member of the Class and do not request exclusion, you will be bound by the Settlement and any judgment and release entered in the Action, whether or not you submit a Proof of Claim.

If you have NOT received a copy of the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement or exclude yourself from the Settlement), and a Claims Data Form or Proof of Claim Form, you may obtain these documents, as well as a copy of the Stipulation (which among other things contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at [www.CareFirstBreastfeedingSupportClassAction.com](http://www.CareFirstBreastfeedingSupportClassAction.com), or by calling 1-855-441-2329.

**IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION SUCH THAT IT IS POSTMARKED NO LATER THAN MARCH 11, 2019, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE CLASS WILL BE BOUND BY THE SETTLEMENT EVEN IF THEY DO NOT FILE A TIMELY PROOF OF CLAIM.**

**IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE REQUEST BY PLAINTIFFS’ COUNSEL FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES, AND/OR THE PAYMENT OF SERVICE AWARDS TO PLAINTIFFS. ANY OBJECTIONS MUST BE FILED WITH THE COURT AND SENT TO CLASS COUNSEL AND CAREFIRST’S COUNSEL BY MARCH 11, 2019, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.**

Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court. Inquiries may be made to a representative of Class Counsel c/o: CHIMICLES SCHWARTZ KRINER & DONALDSON-SMITH LLP, Nicholas E. Chimicles, Kimberly Donaldson-Smith, or Stephanie Saunders, 361 W. Lancaster Avenue, Haverford, PA 19401, 610-642-8500, [kmd@chimicles.com](mailto:kmd@chimicles.com) or [ses@chimicles.com](mailto:ses@chimicles.com).

Form and substance approved by Court Order dated December 12, 2018.