EXHIBIT

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by this Court to serve as Settlement Administrator and to, among other tasks, provide

Angeion was retained by Defendant AllianceMed, LLC, and appointed

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notice to potential Class Members; respond to Class Member inquiries; receive and process Claim Forms; review and determine if submitted claims are valid; and perform other duties as specified in the Settlement Agreement and by the directives of the Court, including but not limited to the Order Regarding Motion for Preliminary Approval of Class Action Settlement, entered on July 16, 2020 granting preliminary approval of the settlement.

- 3. Angeion has administered class action settlements involving millions of class members. A representative list of the settlements administered by Angeion is available at http://www.angeiongroup.com/cases.htm. Through the administration of the settlements referenced above, Angeion has received, processed, and secured data from defendants and other sources. Angeion has analyzed settlement class member data including performing deduplication, Nation Change of Address Searches (NCOA) and address verification searches ("skip traces"). Angeion has successfully implemented noticing campaigns involving direct mail notice, email notice, text noticing, print publication, digital and social media for millions of potential class members. Further, Angeion has analyzed and reported on class member data obtained through claim forms submitted via mail and through online claims filing, class member correspondence, objections to the settlement, exclusion requests and other means. Angeion is experienced in the application of complex claim calculations and, where applicable, tax withholding and reporting, as required by federal, state, and local taxing authorities, as well as in reviewing settlement agreements and court orders.
 - 4. Angeion is not related to or affiliated with the Plaintiff, Plaintiff's Counsel, Defendant or Counsel for Defendant.

CAFA Notice

5. On June 25, 2020, pursuant to 28 U.S.C. §1715, Angeion caused CAFA Notice regarding the settlement to be sent to the Attorneys General of all states and territories, as well as the Attorney General of the United States. A true and accurate copy of the CAFA Notice without exhibits is attached hereto as Exhibit A.

Class Member List

- 6. On or about March 9, 2020, Angeion received from the Defendant the Settlement Class List, which consisted of seven CSV files containing 7,880 records. Each record was comprised the date the fax was sent, the fax number it was sent to, a reference name and the status on if the fax was able to be sent. The Settlement Class is to contain any record where the status of the fax went was equal to "Successful". There were 5,437 records that contained this status.
- 7. On or about March 18, 2020, Angeion submitted the Settlement Class List for two reverse appends. The initial append found mailing addresses for 1,570 records. Angeion then caused the remaining 3,867 records that did not have an address hit through an additional reverse append. This resulted in an additional 2,184 records for which address information was appended. The combined list of records with mailing address contained 3,754 records (referred to herein as the "Class List").

Direct Mail Notice

- 8. Angeion processed the 3,754 mailing addresses through the United States Postal Service ("USPS") National Change of Address ("NCOA") database to identify updated address information for individuals and businesses who have moved in the last four years and filed a change of address card with the USPS. The NCOA results provided 139 updated address information for the Settlement Class Members. Angeion updated the Class List with these updated addresses.
- 9. On August 5, 2020, Angeion caused the Settlement Notice and Claim Form ("Notice") to be mailed to the 3,754 Class Members with an identified address via United States Postal Service ("USPS") First class mail. Attached hereto as Exhibit B is a copy of the Notice.
- 10. As of September 16, 2020, the USPS has returned 349 of the initial Notices mailed as undeliverable, 3 of which contained a forwarding address. Angeion updated the Class Member database and Notices were re-mailed to these 3 records.

 329 of the 332 records returned as undeliverable without a forwarding address were

processed through address verification searches. Of these 329 records a new address was located for 152 records. Angeion updated the Class Member database and remailed Notices to the Class Members located via this process. As a result of the above described efforts, a total of 155 Notices have been re-mailed. Of the re-mailed Notices, none were returned by the USPS a second time. Angeion will perform address verification searches on the remaining 20 undeliverable Notices returned as well as any other Notices returned as undeliverable up to the October 4, 2020 deadlines. The percentage of Notices returned as undeliverable in this case is within the normal range for class action settlements that Angeion has administered.

Case Specific Website

11. On July 30, 2020, Angeion established the following website devoted to this Settlement: www.MedicalFaxSettlement.com ("Settlement Website"). The Settlement Website contains an online claimant portal whereby claimants may submit a Proof of Claim ("Claim Form"). Additionally, the full notice of the class action and proposed settlement ("Long-Form Notice"), Claim Form, Settlement Agreement, and Preliminary Approval Order are available to view and for download. The Settlement Website also has a "Contact Us" page which provides Class Members additional ways they can contact Angeion such as by email or telephone, where they may update their address r submit additional questions regarding the Settlement.

Case Specific Hotline

12. On July 30, 2020, Angeion also established a toll-free hotline devoted to this case to further apprise Class Members of their rights and options in the Settlement: 1-833-930-1919. The toll-free hotline utilizes an interactive voice response ("IVR") system to provide Class Members with responses to frequently asked questions and provide essential information regarding the Settlement. Class Members may also leave a message for the Settlement Administrator providing updated contact information or to ask additional questions and Angeion will call them back. This hotline is accessible 24 hours a day, 7 days a week.

Claim Form Submissions, Requests for Exclusions and Objections

- 13. The deadline for Class Members to submit a Claim Form is October 4, 2020. As of September 16, 2020, Angeion has received 90 Claim Forms (71 submitted via Mail and 20 via the online portal). Angeion will continue to accept and process Claim Forms and shall inform counsel for the Parties of any Claim Forms received.
- 14. The deadline to request exclusion from the Settlement is October 4, 2020. As of September 16, 2020, Angeion has not received any requests for exclusion.
- 15. The deadline to object to the Settlement is October 4, 2020. As of September 16, 2020, Angeion has not received any objections to the Settlement.

Distribution and Remaining Tasks

- 16. The deadline to submit a claim form is October 4, 2020. Angeion will continue to accept Claim Form submissions and reply to Class Member inquiries. Angeion will also continue to keep the Parties apprised of the number of Claim Forms received, as well as any exclusion requests or objections received, and any documentation this is received or postmarked after the deadline date.
- 17. Upon issuance of a Final Order from this Court and the achievement of the benchmarks set forth in the Settlement Agreement, Angeion will cause the distribution of Settlement benefits to take place in accordance with the terms of the Settlement Agreement or as otherwise directed by this court. It is currently anticipated that all approved claimants will receive a \$500 award. Unless the number of approved claims increases to at least 475 by the October 4, 2020, deadline, Angeion does not anticipate a reduction in the \$500 award amount. Any funds remaining shall be distributed to a charitable organization approved by this Court.
- 18. Through August 2020, Angeion has billed \$14,210.15 to administer the Settlement. Angeion estimates that it will bill an additional approximate amount of \$15,789.85 to complete administration of the Settlement.

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I hereby declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Ryan Chumley
Ryan Chumley DATED: September 16, 2020

Exhibit A

ANGEION GROUP
Changing the Rules

1650 Arch Street, Suite 2210 Philadelphia, PA 19103 www.angeiongroup.com 215.563.4116 (P) 215.525.0209 (F)

June 25, 2020

VIA USPS PRIORITY MAIL

United States Attorney General & Appropriate Officials

Re: Notice of Class Action Settlement

Retina Associates Medical Group Inc. v. AllianceMed, LLC

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of AllianceMed, LLC ("AllianceMed"), the defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: Retina Associates Medical Group Inc. v. AllianceMed, LLC

Index Number: 8:18-cv-01670-JVS-KES

Jurisdiction: United States District Court, Central District of California, Southern Division

Date Settlement Filed with Court: June 15, 2020

In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD-ROM:

- 1. 28 U.S.C. § 1715(b)(1)-Complaint: Copies of the Class Action Junk-Fax Complaint, Jury Trial Demanded, filed with Court on September 14, 2018, and the Answer With Affirmative Defenses and Demand for Jury Trial, filed with Court on December 17, 2018, are included on the enclosed CD-ROM.
- 2. 28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings: A hearing is currently scheduled for July 13, 2020 regarding *Plaintiffs' Notice of Motion & Motion for Preliminary Approval of Class Settlement and Certification of Settlement Class*, filed with the Court on June 15, 2020. *Plaintiffs' Notice of Motion is included on the enclosed CD-ROM*.
- 3. 28 U.S.C. § 1715(b)(3)-Notification to Class Members: The proposed long form notice and claim form, filed with the Court on June 15, 2020, are included on the enclosed CD-ROM.
- **4. 28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** A copy of the *Settlement Agreement,* filed with the Court on June 15, 2020, is included on the enclosed CD-ROM.

- 5. 28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements: There are no additional Settlements or other Agreements.
- **6. 28 U.S.C. § 1715(b)(6)-Final Judgment:** As of the date of this CAFA Notice, no Final Judgment or notice of dismissal has been entered in this case. A copy of the Proposed *Final Order of Judgment and Dismissal*, filed with the Court on June 15, 2020, is included on the enclosed CD-ROM
- 7. 28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members: The Settlement Class consists of all persons or business entities of the United States who received an unsolicited fax advertisement from AllianceMed. Unsolicited faxes were sent to approximately 5,437 persons or businesses. According to the area codes associated with the fax numbers, a chart reflecting the number percentage of the class by State is attached on the accompanying CD Rom.
- **8. 28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time.

If you have questions or concerns about this notice, the proposed settlement, or the enclosed materials, or if you did not receive any of the above-listed materials, please contact this office.

Sincerely,

Angeion Group 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 (p) 215-563-4116 (f) 215-563-8839

Enclosure

Exhibit B

If you received a Fax Advertisement from AllianceMed, LLC, in June 2018, a class action settlement may affect your rights. More information about this settlement is set forth in this Notice. Please read it carefully as your rights may be impacted even if you do nothing at all.

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

SUMMARY

- On September 14, 2018, Retina Associates Medical Group, Inc. ("Retina Associates" or "Plaintiff") filed suit in the United States District Court for the Central District of California, captioned *Retina Associates Medical Group, Inc. v. AllianceMed, LLC*, Case No. 8:18-cv-01670-JVS-KES ("Action"). Retina Associates alleged that AllianceMed, LLC ("AllianceMed" or "Defendant"), violated the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), by sending unsolicited fax advertisements that did not contain the required opt-out notice and which were sent to Plaintiff and the Class Members without prior express invitation or permission or an established business relationship.
- A proposed settlement has been reached in the Action, and you may be a Settlement Class Member. You are a Settlement Class Member if you are a person or business entity in the United States who in June 2018 was sent an unsolicited telephone facsimile message of material advertising the commercial availability or quality of any property, goods, or services by or on behalf of AllianceMed.
- If the settlement is finally approved by the Court, Settlement Class Members who submit a timely claim that satisfies the requirements in this Notice will each receive payment of up to \$500 depending on the number of claims submitted.
- Your legal rights are affected whether you act or not and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT				
Do Nothing	You will get no benefit from the settlement.			
	You will give up any right to ever be a part of any other lawsuit against Defendant that relates in any way to the use of a telephone facsimile machine, computer, or other device to send a facsimile advertisement to Settlement Class Members.			
Submit a Claim Form by October 4, 2020	You will receive payment of up to \$500 depending on the number of valid claims submitted if you submit a timely claim form that satisfies the requirements for making a claim and the Court finally approves the settlement.			
	You will also give up any right to ever be a part of any other lawsuit against Defendant that relates in any way to the use of a telephone			

	facsimile machine, computer, or other device to send a facsimile advertisement to Settlement Class Members. A claim form is available at www.MedicalFaxSettlement.com .
Ask To Be Excluded by October 4, 2020	You will not receive a benefit from the settlement. You will keep the ability to sue Defendant in a different lawsuit for the claims at issue in this lawsuit.
	This is the only option that allows you to ever be part of any other lawsuit against Defendant that relates in any way to the use of a telephone facsimile machine, computer, or other device to send a facsimile advertisement to Settlement Class Members
Submit an Objection by October 4, 2020	You may choose to stay in the lawsuit and the Settlement Class, but object to this settlement. By objecting to the settlement you give up your right to be excluded from the settlement and your right to file your own action. If you object to the settlement, you may ask a lawyer to represent you at your own cost. Class Counsel shall file a motion for final settlement approval within forty-five (45) days of the response deadline. The Court has not yet scheduled a Final Approval Hearing. Please check
	www.MedicalFaxSettlement.com for updates. This Hearing will be to consider whether to approve the settlement and the request by the lawyers representing Settlement Class Members for attorneys' fees and costs. To object to the settlement or the application for attorneys' fees and costs, you must timely file a written objection meeting the requirements set forth later in this Notice with the Court and serve a copy on Class Counsel and Defendant's counsel at the addresses listed below. If you have filed such an objection, you may appear at the hearing to explain your objection further.

BASIC INFORMATION

1. What is this Notice about?

The Court issued this Notice because you have a right to know about a proposed settlement in the class action lawsuit, *Retina Associates Medical Group, Inc. v. AllianceMed, LLC*, Case No. 8:18-cv-01670-JVS-KES, pending in the United States District Court for the Central District of California. This lawsuit is based on certain unsolicited fax advertisements that Defendant sent to Settlement Class Members.

This Notice explains the settlement (including your legal rights), who is a Class Member, the benefit available to Class Members, and how to make a claim for a benefit.

2. What is this lawsuit about?

Plaintiff claims that Defendant violated the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), by sending to Plaintiff and the putative class members unsolicited fax advertisements that did not contain the required opt-out notice and without prior express invitation or permission or an established business relationship. Defendant denies wrongdoing or liability of any kind related to Plaintiff's claim but has agreed to settle the case solely to avoid the uncertainties, expenses, and time of further litigation.

3. What is a class action?

In a class action lawsuit, a person called a "Class Representative" (in this case, Plaintiff Retina Associates) sue on behalf of others, called "Class Members," who have similar claims. In a class action, one court resolves in one case the claims of all Class Members except for those who exclude themselves from the class. Plaintiff and Defendant have agreed to treat this case as a class action for purposes of this settlement. The Court has agreed for the reasons set forth in the Court's Preliminary Approval Order available at www.MedicalFaxSettlement.com.

4. Why is there a settlement in this case?

The Court did not decide in favor of Plaintiff or Defendant. Instead, both sides agreed to a settlement. That way, they avoid the risk and expense of continued litigation and trial, and Class Members who satisfy certain conditions will receive a benefit without the risk that their claims ultimately may be found to lack merit if this case were to proceed through litigation. Plaintiff and Class Counsel believe this settlement is in the best interest of all Class Members.

WHO IS IN THE CLASS?

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

The Court has decided that everyone who fits this description is a Class Member:

All persons or business entities in the United States who in June 2018, as identified in AllianceMed's fax transmission records produced as CSV files, were successfully sent through Openfax an unsolicited fax advertisement by or on behalf of AllianceMed, but will exclude the 44 AllianceMed clients as stipulated by the parties.

6. Are there exceptions to the Settlement Class?

Yes. The Class does not include Defendant, its employees and agents, and members of the judiciary.

7. I am still not sure I am included.

If you are not sure whether you are included, you can get help by calling toll free 1-833-930-1919, visiting www.MedicalFaxSettlement.com, or writing with questions to:

AllianceMed TCPA Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 You can also contact Class Counsel:

Seth Lehrman	Ronald J. Eisenberg
Edwards Pottinger LLC	Schultz & Associates LLP
425 North Andrews Avenue, Suite 2	640 Cepi Drive, Suite A
Fort Lauderdale, FL 3301	Chesterfield, MO 63005
(954) 323-2066	(636) 733-6647
seth@epllc.com	reisenberg@sl-lawyers.com

THE SETTLEMENT

8. What benefit is available under the settlement?

The settlement provides that Defendant shall pay Settlement Benefits totaling \$425,000 and, after certain deductions including settlement administration costs and attorneys' fees, to pay a pro rata share up to \$500 to each Class Member who submits a timely and valid claim. If any balance remains thereafter, it shall be distributed to a charitable organization approved by the Court.

9. Are any payments available now?

No. The Court has not yet decided whether to approve the settlement. If the Court does not approve the settlement, no payments will be made. If you want to participate in the settlement, however, you must submit the claim form available at www.MedicalFaxSettlement.com by October 4, 2020.

YOUR RIGHTS AND OPTIONS

10. What am I giving up if I stay in the Settlement Class?

If you stay in the Settlement Class, then you cannot sue Defendant for claims that relate to the use of a telephone facsimile machine, computer, or other device to send a facsimile advertisement to Class Members. If the Court finally approves the settlement then you will be bound by the Settlement Agreement available at www.MedicalFaxSettlement.com.

11. How can I make a claim?

To receive payment, you must submit a valid claim form. Your claim form must include all of the required information, must be verified by you, and must be submitted on or before October 4, 2020. You may obtain a claim form online at www.MedicalFaxSettlement.com, then print and mail it to:

AllianceMed TCPA Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103

or you may submit a claim online.

12. How can I get out of the Settlement Class?

To exclude yourself from the Settlement Class, you must send a letter to the Claims Administrator at:

AllianceMed TCPA Settlement Administrator, ATTN: Exclusion Request P.O. Box 58220 Philadelphia, PA 19102 postmarked no later than October 4, 2020. In your letter, you must include your name, address, telephone number, and a written statement that you wish to be excluded from the settlement Class.

13. How do I tell the Court that I do not like the settlement?

If you are a Class Member and have not excluded yourself from the Class, you can object to the settlement if you do not agree with any part of it. Your objection should include reasons why you think the Court should not finally approve the settlement, and the Court will consider your views. To object, you must file your written objection with the Court no later than **October 4**, **2020** and must mail it to Class Counsel and Counsel for Defendant, postmarked no later than **October 4**, **2020**.

Court	Class Counsel	Counsel for Defendant
U.S. District Court	Seth Lehrman	John W. Leardi
Central District of California	Edwards Pottinger LLC	Buttaci Leardi & Werner, LLC
411 West 4th Street	425 North Andrews Ave.	212 Carnegie Center
Room 1053	Suite 2	Suite 202
Santa Ana, CA 92701	Fort Lauderdale, FL 33301	Princeton, NJ 08540

Your objection must be signed by you or your attorney and must include your name, address, and facsimile phone number, state with specificity the grounds for the objection, and include any documentation to support the objection. If you intend to call witnesses at the fairness hearing, you must identify them.

14. What is the difference between "objecting" and "excluding yourself"?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the settlement no longer affects you.

15. What happens if I do nothing?

If you do nothing, you will be included in the Class, but you will not receive any payment. To receive payment, you must submit a timely and valid Claim Form. If you do nothing, once the settlement is finally approved, you will not be able to start, continue, or be part of any other lawsuit against Defendant that relates in any way to the use of use of a telephone facsimile machine, computer, or other device to send a facsimile advertisement to Settlement Class Members.

THE COURT'S FINAL APPROVAL HEARING

16. When and where will the Court decide whether to approve the settlement?

Class Counsel shall file a motion for final settlement approval within forty-five (45) days of the response deadline. The Court has not yet scheduled a Final Approval Hearing. Please check www.MedicalFaxSettlement.com for updates. At this hearing, the Court will consider whether the settlement should be approved by the Court as fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing and will make its decisions.

17. What else will be decided at the Final Approval Hearing?

At the Final Approval Hearing, Class Counsel will ask the Court for an award of attorneys' fees up to \$127,500 (30% of the \$425,000 Settlement Benefits), plus costs and expenses. The Court will also consider Class Counsel's request for a class representative award of up to \$5,000 for Retina Associates for the services it has rendered and the benefit it obtained for the class.

18. Do I have to come to the hearing?

Not unless you filed an objection to the settlement. Otherwise, Class Counsel will answer any questions that the Court may have, but you may come to the hearing.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

The Court appointed Seth Lehrman of Edwards Pottinger LLC and Ronald J. Eisenberg of Schultz & Associates LLP as Class Counsel to represent you should you submit a claim. You do not have to pay Class Counsel.

20. Should I get my own lawyer?

Class Counsel will represent you if you choose to stay in the Class. You may retain your own lawyer if you want someone other than Class Counsel to represent you, but you will be responsible for paying that lawyer. You are not required to pay Class Counsel. If you ask to be excluded from the Class, Class Counsel will not represent you. If you want a lawyer to represent you with respect to any claim you may have, then you will be required to pay that lawyer.

21. How will and when will Class Counsel be paid?

If the settlement is finally approved, Class Counsel will be paid their attorneys' fees, expenses, and costs from the Settlement Benefits in this case. Class Counsel will file a motion asking the Court for an award of attorneys' fees, expenses, and costs as explained in Paragraph 17 above. Class Counsel will not seek to be paid before the Class is paid.

GETTING MORE INFORMATION

22. Where can I find more details about the settlement?

If you have questions about the settlement, write to Class Counsel at the address above. Include the case number, your name, your fax number, and your current street address on any correspondence. Alternatively, you can call Class Counsel Seth Lehrman at (954) 323-2066 or Ronald J. Eisenberg at (636) 733-6647. You may also contact the AllianceMed TCPA Settlement Administrator at 1-833-930-1919 or visit the settlement website, www.MedicalFaxSettlement.com.

PLEASE DO NOT CALL OR DIRECT ANY INQUIRIES TO DEFENDANT.

RETINA ASSOCIATES MEDICAL GROUP, INC. V. ALLIANCEMED, LLC SETTLEMENT CLAIM FORM

Your Information				
First Name	Last Name			
Business Name (if any)				_
Mailing Address				
City	Sta	ate	Zip	
Telephone Number	Fax	Number in Jun	e 2018	
Email				
Certification				
Under 28 U.S.C. § 1746, I declare that the information I have provid belief. I also certify that I receiv advertising the commercial availa AllianceMed, LLC, in June 2013 releasing and waiving any right to advertisements sent to me by or o	led herein is true and oved one or more unso ability or quality of an 8. I understand that a seek compensation o	correct to the be dicited telephorally property, good under the Set or make any claim	est of my personal knowled ne facsimile messages of rods, or services by or on be tlement Agreement I am im regarding unsolicited fa	dge and naterial ehalf of forever
Date	Signature			_
Return the Claim Form to:				
AllianceMed TCPA Settlement A	dministrator			

Your mailed claim form must be postmarked on or before October 4, 2020.

1650 Arch Street, Suite 2210 Philadelphia, PA 19103

YOUR CLAIM FORM WILL NOT BE RETURNED TO YOU. PLEASE RETAIN A COPY FOR YOUR RECORDS. ACCURATE PROCESSING OF CLAIMS MAY TAKE A SIGNIFICANT AMOUNT OF TIME. THANK YOU IN ADVANCE FOR YOUR PATIENCE.