

NOTICE OF CLASS ACTION SETTLEMENT
AUTHORIZED BY STATE OF NEW MEXICO, COUNTY OF BERNALILLO,
SECOND JUDICIAL DISTRICT COURT

A \$38 Million class action settlement has been reached on behalf of beneficiaries of deceased pediatric cancer patients who received treatment for Acute Lymphoblastic Leukemia (also known as “ALL”) at the University of New Mexico Health Sciences Center or Hospital between January 1, 1977, and March 31, 1997.

The settlement covers pediatric cancer patients who died as recently as December 1, 2019.

Certain beneficiaries of the deceased pediatric cancer patients such as parents, siblings, spouses, children, or other family members may be entitled to compensation under the settlement.

If you believe you may be entitled to compensation, please read this Notice carefully.

A New Mexico state court directed this Notice. This is not a solicitation from a lawyer.

- The Court has preliminarily approved a \$38.05 million settlement in a class action lawsuit entitled *Cummings v. Board of Regents of the University of New Mexico, et al.*, Cause No. CV 2001-00579 (as consolidated with Cause No CV 2001-01409).
- The lawsuit alleges that the University of New Mexico failed to administer proper treatment protocols to Acute Lymphoblastic Leukemia patients treated at the University of New Mexico Health Sciences Center or Hospital (“UNM”) between January 1, 1977, and March 31, 1997.
- The proposed settlement provides compensation to the statutory beneficiaries of pediatric cancer patients who were treated for Acute Lymphoblastic Leukemia by UNM between January 1, 1977 and March 31, 1997, and who died on or before December 1, 2019.
- The settlement creates the following Settlement Class (referred to throughout as the Decedent Class):

Statutory beneficiaries, as defined in the New Mexico Wrongful Death Statute, NMSA 1978, §41-2-3 for all pediatric cancer patients with a diagnosis of Acute Lymphoblastic Leukemia who presented for treatment at the University of New Mexico Health Sciences Center from January 1, 1977 through March 31, 1997, and who, by December 1, 2019, were deceased, excluding individuals with whom UNM previously reached settlements, except that also excluded from the Decedent Class are those individuals who received only temporary treatment at UNM Health Sciences Center and whose treatment protocols were principally administered or designed elsewhere and who did not receive initial or relapse induction treatment in New Mexico.
- This Notice has important information for the personal representatives and statutory beneficiaries of the deceased pediatric cancer patients, including parents, siblings, children or other family members who may be eligible for compensation under the settlement.

- The complete Class Settlement Agreement is available at the Acute Lymphoblastic Leukemia Settlement Class Website (“Website”) at www.UNMChildCancerSettlement.com or you may call (855) 534-5953 to request a copy.
- In the event of any conflict between the terms of this Notice and the Class Settlement Agreement, the terms of the Class Settlement Agreement shall control.

LEGAL RIGHTS AND OPTIONS

The legal rights and options for personal representatives and/or statutory beneficiaries who are members of the class are described in this section.

If you believe you are or may be an appropriate personal representative and/or statutory beneficiary of a deceased pediatric cancer patient as defined above, you may:

File a Claim: You **must** file a Claim Form if you want to participate in the settlement. If you do not file a Claim Form, you will not receive any compensation, even if you are eligible. If the Court grants final approval of this settlement, a Claim Form will be mailed to you if you received this Notice in the mail or requested one on the Website.

Exclude Yourself: If you do not wish to participate in the settlement, you **must** file a notice with the Court excluding yourself from the settlement.

Object: If you do not agree with any part of this settlement, including the plan to distribute money to class members, the requested award of attorneys’ fees and expenses, or the service awards for the named Decedent Class Plaintiffs, you may:

- Write to the Court explaining why you do not agree (*See* Question 15); and
- Ask to speak at the Court Hearing about either the fairness of this settlement or about the requested attorneys’ fees or service awards. (*See* Question 21).

Do Nothing: If you do not file a claim, you will not get money from this settlement. You will give up your rights to sue for damages about the claims in this case. (*See* Questions 11 and 14).

Deadlines: If you wish to exclude yourself from the settlement, or if you wish to be included in the settlement but want to object to the settlement, you must do so by **JULY 6, 2020**. *See* Questions 11-24 for more information about rights and options and all deadlines.

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BASIC INFORMATION

1. Why did I get this Notice?

You are receiving this Notice because case records indicate that you may be a statutory beneficiary of a pediatric cancer patient who was treated for Acute Lymphoblastic Leukemia by the UNM Defendants between January 1, 1977, and March 31, 1997, who is now deceased. A “statutory beneficiary” may include parents, siblings, spouses or children of the pediatric cancer patient.

This Notice tells you about your rights and options in a class action lawsuit in the Second Judicial District Court in Albuquerque, Bernalillo County, New Mexico. Judge Carl Butkus is overseeing this class action, which is entitled *Cummings v. Board of Regents of the University of New Mexico, et al.*, Cause No. CV 2001-00579 (As consolidated with Cause No. CV 2001-01409). This Notice explains the lawsuit, the proposed settlement, the benefits available, eligibility for those benefits, and how to get them.

The people who started this lawsuit are the “Decedent Class Plaintiffs.” The government entities they are suing are the “UNM Defendants.”

This case has been brought by the parents of deceased pediatric cancer patients. They are the “Decedent Class Plaintiffs” and the Court has authorized them to act on behalf of all deceased pediatric cancer patients in the class described below in connection with the proposed settlement of this case. The Decedent Class Plaintiffs are:

- Maria Cummings, individually and as personal representative of the estate of Shaun Michael Chavez
- Jana Vallejos, individually and as personal representative of the estate of Donovan Vallejos

The governmental entities the Deceased Class Plaintiffs are suing are the “UNM Defendants.” The UNM Defendants are:

- Board of Regents of the University of New Mexico
- University of New Mexico Health Sciences Center
- University of New Mexico Hospital
- University of New Mexico School of Medicine

2. What is this lawsuit about?

This lawsuit is principally about whether pediatric cancer patients who were treated for Acute Lymphoblastic Leukemia at the University of New Mexico Health Science Center between January 1, 1977 and March 31, 1997 were given proper care.

3. Why is this a class action?

In a class action, people sue not only for themselves, but also on behalf of other people with similar legal claims and interests. Together all of these people with similar claims and interests form a class and are class members. When a court decides a case or approves a settlement, it is applicable to all members of the class (except class members who exclude themselves). In this case, the Court has given preliminary approval to the class as it is defined below in Question 5, and the settlement for that defined class, and the mailing of this Notice.

4. Why is there a settlement?

The Court has not decided which side was right or wrong or if any laws were violated. Instead, both sides agreed to settle the case and avoid the costs and risks of trial and potential appeals following trial.¹

¹ The case also involves claims by pediatric cancer patients who are still alive. These claims have not been settled and are still being litigated.

In this case, the settlement is the product of extensive negotiations, including mediation before an experienced mediator who was familiar with the facts of the case, chosen by the parties. Settling this case allows class members, the statutory beneficiaries, to receive payments.

The Decedent Class Plaintiffs and their lawyers believe the settlement is best for all class members.

The parties agreed to settle the case after nineteen years of litigation. During discovery, Class Counsel reviewed and analyzed thousands of pages of documents and medical records, and participated in more than 40 depositions, including fact and expert depositions. Also, earlier in the litigation, motions to dismiss, motions for summary judgment and the motion for class certification had been fully briefed and argued, but not all were decided by the Court.

5. Am I part of this settlement?

If this Notice was mailed to you, the records show that your family member was treated for Acute Lymphoblastic Leukemia by the UNM Defendants during the class period and is now deceased. You, and possibly other beneficiaries, may be entitled to compensation from the settlement. The Decedent Class specifically consists of:

Statutory beneficiaries, as defined in the New Mexico Wrongful Death Statute, NMSA 1978, §41-2-3, for all pediatric cancer patients with a diagnosis of Acute Lymphoblastic Leukemia who presented for treatment at the University of New Mexico Health Sciences Center from January 1, 1977 through March 31, 1997, and who, by December 1, 2019, were deceased, excluding individuals with whom UNM previously reached settlements, except that also excluded from the Decedent Class are those individuals who received only temporary treatment at UNM Health Sciences Center and whose treatment protocols were principally administered or designed elsewhere and who did not receive initial or relapse induction treatment in New Mexico.

If you are not sure whether you are part of this settlement, contact the Class Administrator at:

Email: Info@UNMChildCancerSettlement.com

Mail:

**UNM Child Cancer Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103**

Call: (855) 534-5953

SETTLEMENT BENEFITS

6. How much money will I be provided in this settlement?

At this point it is unknown how much each eligible Decedent Class member will receive. Your compensation, if any, depends on several factors, including:

- The number of valid claims that are submitted;
- The total amount of administration expenses, taxes, service awards to Decedent Class Plaintiffs, and attorneys' fees and expenses, all of which will be determined by the Court; and
- Whether a deceased pediatric cancer patient has more than one statutory beneficiary entitled to compensation.

The money in this settlement fund will only be distributed if the Court finally approves the settlement.

7. How do I ask for money from the settlement?

You must submit a Claim Form if you believe you are entitled to compensation under the settlement. The Claim filing process in this matter has not yet commenced. Please go to the settlement website, www.UNMChildCancerSettlement.com and register to receive updates about the settlement. Once the Claim filing process begins, you will be notified and provided a claim form either via email or by mail if you received this notice in the mail or requested a claim form on the website.

If you are unable to register on the settlement website, you may write to the Class Administrator at the address below.

UNM Child Cancer Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

or you can email info@UNMChildCancerSettlement.com or call (855) 534-5953.

HOW TO FILE A CLAIM

8. How do I file a claim?

Once the claim filing period begins, Decedent Class Members will be able to submit claims by using the settlement website (www.UNMChildCancerSettlement.com), emailing Info@UNMChildCancerSettlement.com or returning a paper Claim Form to:

UNM Child Cancer Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Some companies or attorneys may offer to help you file your Claim Form in exchange for a portion of your recovery from the settlement. While you may choose to use such companies or attorneys, you should know that you can file your Claim Form with the Class Administrator on your own, free of charge. Additionally, you are entitled to contact the Class Administrator or Class Counsel for assistance in understanding and filing your Claim Form. You may also contact the Class Administrator or Class Counsel if you have any questions about whether you need additional counsel or help in filing a claim. Again, these communications are at no cost to you.

9. Who decides the value of my claim?

The Class Administrator will calculate the payment to each eligible Decedent Class member under the procedures approved by the Court.

10. How will the Class Administrator determine the value of my claim?

The Class Administrator will follow the process outlined in the Plan of Allocation and Distribution (Allocation Plan) approved by the Court. The Allocation Plan is attached to the Settlement Agreement as Exhibit 4 and is available for review on the Website.

The Allocation Plan requires the Class Administrator to evaluate Claim Forms filed on behalf of Decedent Class members to determine whether the claimant is: (1) a statutory beneficiary of (2) a pediatric cancer patient diagnosed with Acute Lymphoblastic Leukemia who presented for treatment at the University of New Mexico Health Sciences Center or Hospital from January 1, 1977 through March 31, 1997, (3) whose claim was not previously settled with the UNM Defendants, (4) whose treatment protocols were not principally administered or designed elsewhere and who did not receive initial or relapse induction treatment in New Mexico, and (5) who, by December 1, 2019, was deceased. Claimants who satisfy all five conditions are Eligible Decedent Class members.

The net Settlement Fund will be determined by subtracting from the settlement amount (\$ 38 Million) the total amount of payments associated with the costs of notice and claims administration, taxes, service awards to Decedent Class Plaintiffs, and attorneys' fees and expenses, all of which will be determined by the Court.

The Class Administrator will then preliminarily calculate the pro rata share of the net settlement fund that will be allocated to the estate of each deceased pediatric cancer patient who is identified during the claims process. The Class Administrator will then determine who are statutory beneficiaries, determine amounts to be distributed to each such beneficiary and present those determinations to the Court for approval. After the preliminary pro rata shares and amounts to be distributed are determined, a second notice will be provided as directed by the Court to any known or reasonably ascertainable statutory beneficiaries, informing them of the proposed distributions.

Finally, the Class Administrator will distribute the pro rata settlement proceeds allocated to the estates of the deceased pediatric cancer patients to the appropriate statutory beneficiaries under the New Mexico's wrongful death statute, NMSA 1978, § 41-2-3, as approved by the Court.

The wrongful death statute requires that the settlement proceeds be distributed as follows:

- If the deceased is a minor, childless and unmarried, then to the father and mother who shall have an equal interest, or if either of them is dead, then to the survivor;
- If there is a surviving spouse and no child, then to the spouse;
- If there is a surviving spouse and a child or grandchild, then one-half to the surviving spouse and the remaining one-half to the children and grandchildren, the grandchildren taking by right of representation; or
- If there is no father, mother, husband, wife, child or grandchild, then to a surviving brother or sister if there are any.

11. Am I giving up anything by filing a claim or not filing a claim?

Members of the Decedent Class who do not exclude themselves by the deadline will be bound by the terms of the Settlement Agreement, including the release of claims against the Defendants and other Released Parties identified in Paragraph 12 of the Settlement Agreement, whether or not the members file a claim for payment. The settlement will resolve and release claims by class members for monetary compensation against Defendants. The release bars class members from bringing claims based on conduct that was alleged or raised in the litigation, or that could have been alleged or raised in the litigation relating to its subject matter.

The release does *not* extinguish the following claims:

- Claims based on conduct that was not alleged or raised in the litigation.
- Claims of pediatric cancer patients who received treatment at the University of New Mexico Health Sciences Center (or Hospital) for cancers other than Acute Lymphoblastic Leukemia.
- Claims of pediatric cancer patients who were treated for Acute Lymphoblastic Leukemia at the University of New Mexico Health Sciences Center (or Hospital) but are still alive.
- Claims of pediatric cancer patients who were treated for Acute Lymphoblastic Leukemia at the University of New Mexico Health Sciences Center (or Hospital) outside the class period of January 1, 1977, to March 31, 1997.

The full text of the Release can be found in paragraph 23 of the Settlement Agreement, which is available for review on the Website. You should carefully read the Release and if you have any questions about the Release you may:

- Call Class Counsel listed in Question 17 at no charge; or
- Talk to a lawyer, at your own expense, about the Release and what it means to you.

Important! If you want to keep your right to be part of any other lawsuit based on similar claims, you must opt-out (exclude yourself) from the settlement. Instructions for excluding yourself from the settlement are discussed in response to Question 12.

12. How do I exclude myself (or opt out) from the Settlement?

To opt-out (exclude yourself) from the Decedent Class, send a letter to:

**UNM Child Cancer Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103**

Your letter must be postmarked by **JULY 6, 2020**. You cannot exclude yourself by phone, fax, email, or online.

How should I send my letter?

You may send your letter by first-class mail and pay for the postage. You also may send your letter by overnight delivery. Keep a copy for your records.

What should my letter say?

Your letter must be signed by a person authorized to do so and state as follows:

I want to exclude [name of person] from the Decedent Class in the case called *Cummings v. Board of Regents of the University of New Mexico, et al.*

My personal information is:

- Your name (first, middle, last):
- Name of deceased pediatric patient
- Your relationship to the deceased pediatric patient:
- Your address:
- Your phone number:
- The contact information for my lawyer (if any)

Warning! If your letter is sent after the deadline it will be considered invalid. If this happens, you won't be excluded from the Decedent Class, and you will still be part of the settlement and will be bound by all of its terms.

13. If I exclude myself from the Decedent Class, can I still get money from this Settlement?

No. If you exclude yourself from the Decedent Class:

- You cannot get money from this settlement; and
- You cannot object to the settlement.

The deadline to exclude yourself is **JULY 6, 2020**. To do this, see response to Question 12 or visit www.UNMChildCancerSettlement.com.

Important! If you exclude yourself, do not file a Claim Form asking for payment.

14. If I do not exclude myself from the Decedent Class, can I individually sue these Defendants for damages?

No. If you do not exclude yourself, you give up your right to sue any of the Released Parties described in the Settlement Agreement.

HOW TO DISAGREE WITH THE SETTLEMENT

15. What if I disagree with any of the Settlement terms or the requested attorneys' fees, expenses or service awards to the Decedent Class Plaintiffs?

If you do not exclude yourself from the Decedent Class, you may object to the settlement or the request for attorneys' fees and expenses to Class Counsel or service awards to the Decedent Class Plaintiffs. The Court will consider your objection(s) when it evaluates whether to finally approve the settlement and whether to award attorneys' fees and expenses and to Class Counsel or service awards to the Decedent Class Plaintiffs.

How do I tell the Court I disagree with the settlement?

You must file a Statement of Objections with the Court no later than **JULY 6, 2020** at this address on the following page:

**Clerk of the Court
Bernalillo County Courthouse
400 Lomas NW
Albuquerque, NM 87102**

You must also send a copy of your Statement of Objections to Decedent Class Counsel and Counsel for the Defendants by first class mail, postmarked no later than **JULY 6, 2020**, at the following addresses:

Designated Decedent Class Counsel:

Jacob G. Vigil Vigil Law Firm, P.A. 2014 Central Avenue SW Suite A Albuquerque, NM 87104	Joseph Goldberg Vincent J. Ward Frank T. Davis Freedman Boyd Hollander Goldberg Urias & Ward, P.A. 20 First Plaza NW Suite 700 Albuquerque, NM 87102	Catherine D. Bertram Bertram Law Group 700 Pennsylvania Avenue SE, Suite 450 Washington, D.C. 20003
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Designated Defendants’ Counsel:

R. Nelson Franse Leslie McCarthy Apodaca Andrew G. Schultz Rodey, Dickason, Sloan Akin & Robb, P.A. P.O. Box 1888 Albuquerque, NM 87103	Thomas Ryan Gregory Jones McDermott Will & Emery LLP 2049 Century Park East Suite 3200 Los Angeles, CA 90067
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You must mail your letter to the Clerk of Court, the attorneys for the class and defendants postmarked by **JULY 6, 2020**.

What should my Statement of Objections say?

Your Statement of Objections must contain the following information:

I am a member of the Decedent Class in the case called *Cummings v. Board of Regents of the University of New Mexico, et al.*

I am a class member because: [identify the deceased pediatric cancer patient and your relationship to that patient].

My reasons for objection are:

State whether you wish to speak at the hearing (see Question 21, below).

My personal information is:

- Your name (first, middle, last):
- Name of deceased pediatric patient
- Your relationship to the deceased pediatric patient:
- Your address:
- Your phone number:
- The contact information for my lawyer (if any)

Can I call the Court or the Judge’s office about my objections?

No. If you have questions, you may visit the website for the Settlement www.UNMChildCancerSettlement.com, email the Class Administrator at info@UNMChildCancerSettlement.com or call the Class Administrator toll free at **(855) 534-5953**.

16. Is objecting the same thing as being excluded?

No. **Objecting** means you tell the Court which part(s) of the Settlement you disagree with (including the plan for distributing the settlement fund, request for attorneys' fees and expenses, or service awards for the named Decedent Class Plaintiffs).

Being **excluded** (also called opting-out) means you tell the Court you do not want to be part of the Decedent Class.

THE LAWYERS REPRESENTING YOU

17. Who are the lawyers that represented the Decedent Class?

The Court has appointed the lawyers listed below to represent you. These lawyers are called Class Counsel. Other lawyers have also worked with Class Counsel to represent you in this case. Because you are a class member, you do not have to pay any of these lawyers. They will be paid from the settlement fund.

Jacob G. Vigil Vigil Law Firm, P.A. 2014 Central Avenue SW Suite A Albuquerque, NM 87104 (505) 243-1706 jake@zlaws.com	Joseph Goldberg Vincent J. Ward Frank T. Davis Freedman Boyd Hollander Goldberg Urias & Ward, P.A. 20 First Plaza NW Suite 700 Albuquerque, NM 87102 (505) 842-9960 jg@fbdlaw.com vjw@fbdlaw.com ftd@fbdlaw.com	Catherine D. Bertram Bertram Law Group 700 Pennsylvania Avenue SE, Suite 450 Washington, D.C. 20003 (202) 803-5800 katie@blg-dc.com
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18. How much will the lawyers and the Decedent Class Plaintiffs be paid?

For work done through final approval of the settlement by the district court, Class Counsel will ask the Court for an amount that is a reasonable proportion of the settlement fund, not to exceed 35% of the settlement fund, to compensate all of the lawyers and their law firms that have worked on the class case.

Class Counsel will also request an award of their reasonable litigation expenses (not including the administrative costs of settlement or notice).

The Decedent Class Plaintiffs may receive a service award of up to \$50,000 each for their representation of the members of the Deceased Class, which culminated in the Settlement Agreement.

The amounts to be awarded as attorneys' fees, expenses, and Decedent Class Plaintiffs' service awards **must** be approved by the Court. Class Counsel must file their requests for fees, expenses, and service awards with the Court by **JULY 16, 2020**. You can object to the requests for attorneys' fees, expenses, and service awards in compliance with the instructions in Question 15 above.

Copies of the lawyers' requests for fees, expenses, and service awards can be obtained from the Class Administrator or on the class website.

19. Do I have to go to the hearing to get my money?

No. You do not have to go to the hearing, even if you sent an objection to the Court. But you can go to the hearing, or hire a lawyer to go the hearing, if you want to, at your own expense.

20. When and where will the Court decide whether to approve the Settlement?

There will be a Fairness Hearing at **9:00 a.m. on JULY 28, 2020**. The hearing will take place in Courtroom 502 at:

**Second Judicial District
Bernalillo County Courthouse
400 Lomas NW
Albuquerque, NM 87102**

We do not know how long the Court will take to make its decision.

Important! The time and date of this hearing may change without additional mailed or published notice. For updated information on the hearing, contact the Class Administrator or visit www.UNMChildCancerSettlement.com.

Why is there a hearing?

The hearing is about whether or not the settlement should be finally approved as fair, adequate, and reasonable. The Court will consider any objections and listen to class members who have asked to speak at the hearing. The Court will also decide whether it should give its final approval of Class Counsel’s requests for attorneys’ fees and expenses, service awards to Decedent Class Plaintiffs, and other costs.

21. What if I want to speak at the final approval hearing?

You must state in your objections that you want to speak at the hearing, or you can file a Notice of Intention to Appear with the Court at this address:

**Second Judicial District
Bernalillo County Courthouse
400 Lomas NW
Albuquerque, NM 87102**

Your Notice of Intention to Appear must be filed by **JULY 6, 2020**. You must also mail a copy of your letter to Class Counsel and Counsel for the Defendants at the addresses listed in Question 19.

What should my Notice of Intention to Appear say?

Your Notice of Intention to Appear must be signed and contain the following information:

I want to speak at the Fairness Hearing for the case called *Cummings v. Board of Regents of the University of New Mexico, et al.*

My personal information is:

- Name (first, middle, last):
- Address:
- Phone:
- I am a class member because: [identify the deceased pediatric cancer patient and your relationship to that patient]
- I wish to speak about: [fill in]

IF YOU DO NOTHING

22. What happens if I do nothing?

If you do not file a claim, you cannot get money from this settlement.

If you do not exclude yourself from the Deceased Class, you cannot be part of any other lawsuit against Defendants and other released parties listed in the Settlement Agreement for released conduct. You will be bound by the Release.

GETTING MORE INFORMATION

23. How do I get more information?

There are several ways to get more information about the Settlement.

You may write, email, or call the Class Administrator. The Class Administrator's contact information is as follows.

Email: Info@UNMChildCancerSettlement.com

Mail:

**UNM Child Cancer Settlement
1650 Arch Street, Suite 2210
Philadelphia, PA 19103**

Call: (855) 534-5953

You can also get more information, including copies of the Settlement Agreement and other documents related to this case, at the Settlement Website: www.UNMChildCancerSettlement.com.

Please do not attempt to contact Judge Butkus or the Clerk of Court with any questions.