

*Andrew Hecht and Andrea Hecht v. Cigna Health and Life  
Insurance Company*  
Northern District of Illinois, Eastern Division  
Case No. 1:24-cv-05926

If you were covered by health benefits pursuant a LocalPlus Plan for which Cigna provided administrative services, you may be entitled to benefits under a class action lawsuit.

*A court authorized this Notice. This is not a solicitation from a lawyer.*

- **A proposed settlement will create a Constructive Common Fund to fully settle and release claims of the following individuals:**

All persons covered by health benefits pursuant to a LocalPlus Plan for which Cigna provided administrative services and who underwent treatment and received an Explanation of Benefits from Cigna indicating that the treating healthcare provider was In-Network when the provider was in fact Out-of-Network because of a mistake in how their LocalPlus Plan's benefits were configured in Cigna's benefits system.

The following are excluded from the Settlement Class: (1) any of Cigna's officers or directors; (2) the judicial officers to whom this case is assigned and any members of their staffs and immediate families; (3) any heirs, assigns, or successors of any of the persons or entities described in parts (1) and (2) of this paragraph; and (4) anyone who timely opts-out of the Settlement pursuant to ¶ 6.1 of the Settlement.

- **Cigna denies Plaintiffs' allegations and denies any wrongdoing whatsoever. The Court has not ruled on the merits of Plaintiffs' claims or Cigna's defenses. By entering into the settlement, Cigna has not conceded the truth or validity of any of the claims against it.**
- **If you are receiving this Notice, at least one of your claims was affected, but that does not mean all of your claims were affected. Only a small number of claims were affected. You will be receiving a letter from the settlement administrator that identifies the Cigna claim ID number for the claims that are subject to the settlement.**
- **The Constructive Common Fund consists of \$4,642,152.03 in injunctive relief benefits, \$300,000 in claims made cash benefits, \$20,000 in Class Representative Incentive Awards, and \$750,000 in attorneys' fees and costs to the attorneys representing Plaintiffs and the Settlement Class ("Class Counsel"). Settlement Class Members who received a bill from their medical provider for the difference between the provider's billed charge and the allowed amount determined by Cigna even though Cigna categorized the treatment as in-network (which is referred to as a "balance bill") are entitled to submit a claim for monetary relief. This bill would be different than your copayments, coinsurance, and deductible payments. If your provider honored the in-network treatment of the claim, you should NOT have received a balance bill. To be eligible, a Class Member must timely file a valid Claim Form and provide proof of the balance bill. Cigna will make available a total of \$300,000 to satisfy approved claims for balance bill liability. If the aggregate value of valid claims exceeds \$300,000, each eligible Class Member will receive a pro rata share of the \$300,000 fund, rather than the full amount of their balance bill liability.**

- Cigna has also agreed not to reprocess past claims that were mistakenly treated as in-network such that those claims will not be converted to out-of-network status, which is how the claims should have been adjudicated originally. Without this protection, Class Members could have been held responsible for up to \$4,642,152.03 in balance bill charges. This agreement ensures that Class Members will not face those additional liabilities. Class Members do NOT need to submit a claim form to receive this protection as it will be afforded to all class members.
- Your rights and options, and the deadlines to exercise them, are explained in this Notice. Your legal rights are affected whether you act or do not act. Read this Notice carefully.

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT: |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MAKE A CLAIM                                      | To obtain money from the settlement you must make a claim. To make a claim, you must fully complete the Claim Form that was sent to you and mail it to the Settlement Administrator postmarked by January 5, 2026 or submit an online claim form at <a href="http://www.CignaLocalPlusSettlement.com">www.CignaLocalPlusSettlement.com</a> by January 5, 2026.                                                                      |
| EXCLUDE YOURSELF OR "OPT-OUT" OF THE SETTLEMENT   | If you ask to be excluded, you will not receive a payment. This is the only option that allows you to pursue your own claims against Cigna or other released parties related to a released claim. The deadline for excluding yourself is January 5, 2026.                                                                                                                                                                           |
| OBJECT TO THE SETTLEMENT                          | If you wish to object to the settlement, you must write to the Court about why you believe the settlement is unfair in any respect. The deadline for objecting is January 5, 2026.                                                                                                                                                                                                                                                  |
| DO NOTHING                                        | If you do nothing, you will not receive a payment from the settlement but you will give up your rights to sue Cigna or any other released parties related to a released claim.                                                                                                                                                                                                                                                      |
| GO TO THE FINAL APPROVAL HEARING                  | You may attend the Final Approval Hearing. At the Final Approval Hearing you may ask to speak in Court about the fairness of the settlement. To speak at the Final Approval Hearing, you must file a document that includes your name, address, telephone number and your signature with the Court, which must also state your intention to appear at the Final Approval Hearing. This must be filed no later than January 5, 2026. |

- These rights and options-and the deadlines to exercise them-are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the settlement. Monetary Benefits will be disbursed if the Court approves the settlement and after any appeals are resolved. Please be patient.

## BASIC INFORMATION

### 1. What is the purpose of this Notice?

The purpose of this Notice is to inform you that a proposed Settlement has been reached in the putative class action lawsuit entitled *Andrew Hecht and Andrea Hecht v. Cigna Health & Life Ins. Co.*, Case No. 1:24-cv-05926, which was filed in the United States District Court for the Northern District of Illinois, Eastern Division. Because your rights will be affected by this Settlement, it is extremely important that you read this Notice carefully. This Notice summarizes the settlement and your rights under it.

### 2. What does it mean if I received an email or postcard about this settlement?

If you received a letter describing this settlement, it is because Cigna's records indicate that you may be a member of the Settlement Class. The members of the Settlement Class include:

All persons covered by health benefits pursuant to a LocalPlus Plan for which Cigna provided administrative services and who underwent treatment and received an Explanation of Benefits from Cigna indicating that the treating healthcare provider was In-Network when the provider was in fact Out-of-Network because of a mistake in how their LocalPlus Plan's benefits were configured in Cigna's benefits system.

The following are excluded from the Settlement Class: (1) any of Cigna's officers or directors; (2) the judicial officers to whom this case is assigned and any members of their staffs and immediate families; (3) any heirs, assigns, or successors of any of the persons or entities described in parts (1) and (2) of this paragraph; and (4) anyone who timely opts-out of the Settlement pursuant to ¶ 6.1 of the Settlement.

### 3. What is this class action lawsuit about?

In a class action, a person called a Class Representative (here, Plaintiffs Andrew Hecht and Andrea Hecht) sues on behalf of people who allegedly have similar claims. This group is called a class and the persons included are called class members. One court resolves the issues for all of the class members, except for those who exclude themselves from the class.

Here, Plaintiffs claim Cigna violated the Employee Retirement Income Security Act of 1974 § 502(a)(3) ("ERISA") when it breached its fiduciary duty by miscoding claims as in-network when those claims were really out-of-network. The Court has conditionally certified a class action for settlement purposes only. The Honorable Manish S. Shah is in charge of this action.

### 4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Cigna. Instead, the parties agreed to this settlement. This way, the parties avoid the risk and cost of a trial, and the Settlement Class members will receive compensation as set forth above and in the Settlement Agreement. Plaintiffs and Class Counsel think the settlement is best for all persons in the Settlement Class.

## WHO IS IN THE SETTLEMENT CLASS?

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

The Court has certified a class action for settlement purposes only. The Settlement Class is defined as:

All persons covered by health benefits pursuant to a LocalPlus Plan for which Cigna provided administrative services and who underwent treatment and received an Explanation of Benefits from Cigna indicating that the treating healthcare provider was In-Network when the provider was in fact Out-of-Network because of a mistake in how their LocalPlus Plan's benefits were configured in Cigna's benefits system.

A "Settlement Class Member" is any person in the Settlement Class who is not validly excluded from the Settlement Class. If you are still not sure whether you are included, you can visit other sections of the Settlement Website, [www.CignaLocalPlusSettlement.com](http://www.CignaLocalPlusSettlement.com), or you may write to the Settlement Administrator at Cigna LocalPlus Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103 for more information.

## THE LAWYERS REPRESENTING YOU

### 6. Do I have lawyers in this case?

The Court has appointed the law firms of Jaszczuk, P.C. and Consumer Law Advocate, PLLC as Class Counsel to represent you and the other persons in the Settlement Class. You will not be personally charged by these lawyers.

### 7. How will Class Counsel be paid?

Class Counsel will ask the Court to approve payment of \$750,000 from the constructive common fund, plus reasonable expenses. Class Counsel also will ask the Court to approve payment of \$10,000 to each Plaintiff for their services as Class Representatives. The Court may award less than these amounts.

## THE SETTLEMENT BENEFITS- WHAT YOU GET

### 8. What does the settlement provide?

**Constructive Common Fund.** A constructive common fund will be created, which will cover: (1) injunctive relief, pursuant to which Cigna will agree not to re-categorize as "out-of-network" claims that Cigna erroneously coded as "in-network," which is expected to save Class Members approximately \$4,642,152.03; (2) cash payments to Settlement Class Members who submit valid claims, up to \$300,000; (3) an award of attorneys' fees and expenses to Class Counsel, as approved by the Court, not to exceed \$750,000; and (4) a service award of \$10,000 to each of the Plaintiffs, Andrew Hecht and Andrea Hecht, if approved by the Court.

## 9. How much will my payment be?

A Class Member is eligible to receive a cash payment if they are able to submit sufficient proof that they received a balance bill. This bill would be different than your copayments, coinsurance, and deductible payments. If your provider honored the in-network treatment of the claim, you should **NOT** have received a balance bill. The amount any Class Member receives will depend on several factors, including how many people submit claims and the amount of each person's balance bill. If the total amount of valid claims is more than \$300,000, the \$300,000 fund will be divided pro rata among all Class Members who submit valid claims, meaning each person will receive a proportional share of the fund rather than the full amount of their balance bill.

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

Unless you exclude yourself from the settlement, you will be part of the Settlement Class and will be bound by the release of claims in the settlement. This means that if the settlement is approved, you cannot rely on any Released Claim to sue, or continue to sue, Cigna or other Released Parties, on your own or as part of any other lawsuit, as explained in the Settlement Agreement. It also means that all of the Court's orders will apply to you and legally bind you. Unless you exclude yourself from the Settlement, you will agree to release Cigna and all other Released Parties, as defined in the Settlement Agreement, from any and all claims for damages that arise under ERISA related to Cigna's miscoding of healthcare providers' LocalPlus network status.

In summary, the Release includes any and all claims, whether known or unknown for damages under ERISA regarding Cigna's miscoding of claims as in-network when they were actually out-of-network.

If you have any questions about the Release or what it means, you can review the Settlement Agreement at [www.CignaLocalPlusSettlement.com](http://www.CignaLocalPlusSettlement.com), speak to Class Counsel, listed under Question 6, for free; or, at your own expense, you may talk to your own lawyer. The Release does not apply to persons in the Settlement Class who timely exclude themselves.

## HOW TO OBTAIN A PAYMENT

## 11. How can I get a payment?

To obtain a payment from the settlement, you must make a claim. To make a claim, you must fully complete the Claim Form that was sent to you, providing the following information: (1) your name and mailing address; (2) your email address (unless you return the claim form by mail, in which case an email address is optional); (3) your Cigna ID number; (4) one of the following: (a) proof of payment of a balance bill, including any interest, penalties, or debt collection fees incurred in connection with the balance bill to the extent you have incurred and seek to recover interest charges, debt collection fees, or penalties directly related to a balance bill; or (b) if you have not yet paid the balance bill, a signed affirmation that you will use the settlement payment solely to satisfy the balance bill, including any applicable interest, penalties, or debt collection fees, by paying either (i) the healthcare provider or (ii) a debt collector or assignee who holds the balance bill, and you agree to hold Cigna harmless for all liability arising from non-payment of the balance bill, including interest, debt collection fees, and penalties.

Claim Forms must be mailed to the Settlement Administrator at Cigna LocalPlus Settlement

Administrator, ATTN: Claim Forms, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103 postmarked by January 5, 2026, or alternatively you may submit an online claim form and supporting documentation at [www.CignaLocalPlusSettlement.com](http://www.CignaLocalPlusSettlement.com) by January 5, 2026. If your claim is approved, a check will be mailed to you, along with a 1099 Form.

## **WHEN WILL I RECEIVE MY SETTLEMENT PAYMENT?**

### **12. When would I receive a settlement payment?**

The Court will hold a hearing on March 24, 2026 to decide whether to approve the Settlement. If the Court approves the Settlement, after that, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Settlement Class Members will be informed of the progress of the settlement through information posted on the Settlement Website at [www.CignaLocalPlusSettlement.com](http://www.CignaLocalPlusSettlement.com). Please be patient.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

### **13. How do I get out of the settlement?**

If you want to keep the right to sue, or continue to sue Cigna or a Released Party, as defined in the Settlement Agreement, then you must take steps to get out of the Settlement Class. This is called excluding yourself from, or opting-out of, the Settlement Class.

A Settlement Class Member who wishes to exclude himself or herself from this Settlement, and from the Release pursuant to this Settlement, shall submit a written Opt-Out Request to the Settlement Administrator at the address designated in the Notice no later than the Opt-Out/Objection Deadline. Opt-Out Requests must: (i) be timely submitted by the Opt-Out/Objection Deadline; (ii) be signed by the person in the Settlement Class who is requesting to be excluded from the Settlement Class; (iii) include the name and address of the person in the Settlement Class requesting exclusion; and (iv) include a statement or words to the effect of the following: "I request to be excluded from the Cigna ERISA Settlement, and understand that by doing so I will not be entitled to receive any of the benefits from the settlement." No person may exclude any other person from the Settlement Class.

**To be valid, you must mail your exclusion request postmarked no later than January 5, 2026, to the Settlement Administrator at Cigna LocalPlus Settlement Administrator, Exclusions, P.O. Box 58220, Philadelphia, PA 19102.**

### **14. If I do not exclude myself, can I still sue Cigna?**

No. If you do not exclude yourself, you give up any right to sue (or continue to sue) Cigna or any Released Parties for the claims that this settlement resolves.

### **15. If I exclude myself, can I get a benefit from this settlement?**

No. If you exclude yourself, you will not receive a settlement payment, you will not be entitled to benefit from Cigna's commitment not to reprocess claims, and you cannot object to the settlement.

## OBJECTING TO THE SETTLEMENT

### 16. How do I tell the Court that I do not think the settlement is fair?

If you are in the Settlement Class, you can object to the settlement or any part of the settlement that you think the Court should reject, and the Court will consider your views. If you do not provide a written objection in the manner described below, you shall be deemed to have waived any objection and shall forever be foreclosed from making any objection to the fairness, reasonableness, or adequacy of the settlement, or the award of any attorneys' fees and expenses, and/or any proposed service award.

To object, you must make your objection in writing, stating that you object to the Settlement. To be considered by the Court, you must personally sign the objection and provide the following information with it: (1) your full name and current address and telephone number (2) your Cigna ID number; (3) a detailed statement of each objection asserted; (4) the grounds for each objection; (5) all supporting papers, including, without limitation, all briefs, written evidence, and declarations; (6) a statement of whether you intend to appear at the Final Approval Hearing; (7) a list of witnesses you intend to call; and (8) your signature and the signature of any attorney representing you. In addition, you must provide a detailed list of any other objections submitted by you, or your counsel, to any class action settlements submitted in any court, whether state, federal, or otherwise, in the United States in the previous five years; if neither you nor your counsel have made any such prior objection, you must affirmatively so state in the written materials provided with the objection.

**To be considered, you must file your objections with the Court and mail your objections to the addresses below no later than January 5, 2026**

#### To the Class:

Matthew Peterson  
Consumer Law Advocate, PLLC  
680 N. Lake Shore Dr., Suite  
110  
Chicago, IL 60611  
Tel: (815) 999-9130  
[rntp@lawsforconsumers.com](mailto:rntp@lawsforconsumers.com)

Martin W. Jaszczuk  
Margaret M. Schuchardt  
JASZCZUK P.C.  
311 South Wacker Drive, Suite 2150  
Chicago, Illinois 60606  
Tel: (312) 442-0509  
[rjjaszczuk@jaszczuk.com](mailto:rjjaszczuk@jaszczuk.com)  
[rnschuchardt@jaszczuk.com](mailto:rnschuchardt@jaszczuk.com)

#### To the Defendant

Richard Nicholson  
McDermott Will & Schulte  
One Vanderbilt Avenue,  
New York, NY 10017  
[rnicholson@mwe.com](mailto:rnicholson@mwe.com)

### **17. What is the difference between objecting and excluding yourself?**

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

### **IF YOU DO NOTHING**

### **18. What happens if I do nothing at all?**

If you do nothing, you will not receive a payment from the settlement but you will be entitled to benefit from Cigna's commitment not to reprocess impacted claims from in-network to out-of-network. You will also give up your rights to sue Cigna or any other released parties in connection with a released claim. For information relating to what rights you are giving up, see Question 10.

### **THE FINAL APPROVAL HEARING**

### **19. When and where will the Court decide whether to approve the settlement?**

The Court will hold a final approval hearing on March 24, 2026 at 11:00 a.m. before the Honorable Manish S. Shah or via remote means as instructed by the Court. Instructions for participating remotely will be posted on the Settlement Website. At this hearing, the Court will consider whether the settlement is fair, reasonable and adequate. If there are valid objections that comply with the requirements in Question 16 above, the Court also will consider them and will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel and Plaintiffs.

The Final Approval Hearing may be moved to a different date or time without additional notice, so it is a good idea to check the Settlement Website for updates.

### **20. Do I have to come to the hearing?**

No. Class Counsel will appear on behalf of the Settlement Class. But, you are welcome to come, or have your own lawyer appear, at your own expense.

### **21. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing, but only in connection with an objection that you have timely submitted to the Court according to the procedure set forth in Question 16 above. To speak at the Final Approval Hearing, you must also file a document with the Court stating your intention to appear. For this document to be considered, it must include your name, address, telephone number and your signature. The document must be filed with the Court no later than January 5, 2026. You cannot speak at the hearing if you exclude yourself from the settlement.

### **GETTING MORE INFORMATION**

### **22. How do I get more information?**



This notice is only a summary of the proposed settlement. You can get a copy of the settlement agreement by visiting the Settlement Website, [www.CignaLocalPlusSettlement.com](http://www.CignaLocalPlusSettlement.com). You can also call Class Counsel with any questions at (815) 999-9130 or (312) 442-0509.

**DO NOT CALL OR WRITE TO THE COURT, THE CLERK OF THE COURT, CIGNA, OR CIGNA'S COUNSEL ABOUT THE SETTLEMENT.**