

## NOTICE OF CLASS ACTION SETTLEMENT

*This is a court-approved notice. It is not an attorney solicitation or advertisement.*

The parties have proposed a class settlement in the case of *Savannah Thompson, et al. vs. John Muir Health Inc.*, which is now pending before Judge Edward G. Weil in Department 39 of the Contra Costa Superior Court as Case No. C22-02125.

On April 2, 2026 at 9 a.m., in Department 39, the Court will conduct a final hearing to decide whether to approve the settlement. If you received a postcard and/or email that directed you to this website, records indicated that you are a member of the group affected by the proposed settlement (a “Class Member”), and this notifies you of your options.

**IF YOU DO NOTHING:** You will be bound by the terms of settlement and you will automatically receive the benefits due to you under the settlement, but you will not be able to bring your own lawsuit regarding the issue covered by the settlement. Please read on for more information about the case, the settlement, and its benefits.

**IF YOU EXCLUDE YOURSELF FROM THE CLASS:** You will not be bound by the settlement and will not receive any benefits from the settlement, but you will retain the right to bring your own lawsuit regarding the same issue that the settlement resolves. **The deadline to exclude yourself is March 5, 2026.** Please read on for instructions on how to exclude yourself from the class.

**YOU CAN OBJECT TO THE SETTLEMENT:** If you remain in the class, you can file a written objection to the settlement and appear at the hearing to tell the judge why you do not like the settlement. **The deadline to object to the settlement is March 5, 2026.** Please read on for instructions on how to object.

The purpose of this notice is to explain:

1. What is this lawsuit about?
2. What is this notice?
3. What are the benefits of the settlement?
4. What is a class action?
5. Who are the Class Members in this case?
6. How to exclude yourself from the class and the settlement?
7. How Class Members can object to the settlement.
8. What attorneys represent the Class Members?
9. How are Class Counsel paid?
10. Could it cost me anything to be a Class Member?
11. How to get more information about this lawsuit and settlement?

### 1. What is this lawsuit about?

The lawsuit concerns the gross charge that John Muir Health (“John Muir”) emergency departments charged for a certain urine test (the “Service”) between October 4, 2018 and December 31, 2022. Plaintiff Savannah Thompson filed a lawsuit alleging that John Muir, as a result of the gross charge for the service, overcharged her and other Class Members for the Service, even though the actual amount charged for the service varies depending on whether the patient has insurance and, if so, what type. John Muir denies the allegations. The judge has not decided who is right.

### 2. What is this notice?

This notice gives Class Members the opportunity to exclude themselves from the lawsuit or object to the settlement. On March 21, 2025, the judge certified the lawsuit as a class action on behalf of Kaiser insured and uninsured patients who received the Service during the class period. The parties reviewed (anonymized) records and identified 289 Class Members. Now, rather than go to trial, the parties have negotiated a settlement to resolve the case for every Class Member. The judge must decide whether to approve the settlement. If you received a postcard or email directing you to this website, that is because you have been identified as a Class Member.

### 3. What are the benefits of the settlement?

The settlement is designed to put all Class Members in the financial position they would have been in if John Muir had not included any charge for the Service. Because Class Members received a variety of unrelated services from the emergency department, and Class Members had different insurance benefits, the settlement uses a formula to calculate how much less each Class Member would have personally paid or owed to John Muir, after accounting for

insurance benefits and/or other discounts, if the price for the Service has been zero. The settlement also credits an additional \$750 to each member of a sub-class that will be resolving claims related to allegedly unfair debt collection.

Under the settlement, the resulting total credits to each Class Member are first applied to reduce any account balance that they still owe John Muir. For Class Members who do not owe any account balance (or whose total credits are greater than their account balances), the credit (or remainder of the credit) will be refunded by check to each Class Member up to the total amount that the Class Member actually paid to John Muir for the entire medical encounter on that date.

There are 289 current Class Members. Each will receive either a cash refund payment or an adjustment to their account balance. The total cash refund payments to these Class Members is \$59,483.22 and the total credits to these Class Members' unpaid account balances is \$636,783.17. If you are a Class Member, and the settlement is approved by the Court, you will receive the benefits due to you under the settlement. No further action is required.

#### 4. What is a class action?

In a class action, one or more people called class representatives (in this case, Savannah Thompson) sue on behalf of people who have similar claims. Often this occurs because the individual value of each claim is insufficient to warrant any person suing on their own. Once a class is certified, the lawsuit is resolved for all of the people in the class, except for those who timely exclude themselves from the class.

#### 5. Who are the Class Members in this case?

The Class Members in this case consists of all persons who (1) received medical services at a John Muir Hospital Emergency Department between October 4, 2018 and December 31, 2022 (2) that included the Service at issue in this case, (3) had Kaiser insurance or were uninsured at the time, and (4) were held financially responsible by John Muir for the services rendered at the encounter in an amount beyond a flat fee insurance deductible (the "Class"). There is also a subclass consisting of all Class Members who, on or after October 4, 2021, received bills for the medical services rendered at the encounter that stated their accounts were past due. John Muir records have identified 289 persons who fit the Class definition, 63 of whom are also in the subclass. Only these persons are Class Members (except any Class Member may exclude himself or herself from the Class as discussed below.)

If you received a postcard and/or email directing you to this website, that is because John Muir records indicate that you are a Class Member.

#### 6. How to exclude yourself from the class and the settlement?

To ask to be excluded from the class and the settlement, send a letter that contains the full name and address of the person seeking exclusion and a sentence stating: "The undersigned hereby requests exclusion from the Class." You must sign the letter and mail it postmarked by **March 5, 2026** to:

*John Muir Health Class Action*  
*c/o Settlement Administrator*  
 P.O. Box 2467,  
 Portland, OR 97208-2467

You may also send the letter by email to: [info@JohnMuirHealthClassActionsettlement.com](mailto:info@JohnMuirHealthClassActionsettlement.com).

#### 7. How Class Members can object to the settlement.

If you disagree with any part of the settlement (including the attorney fees) but don't want to exclude yourself, you may file an objection to the settlement. You must give reasons why you think the court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The court will consider your views. The court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you. To object, you must send a letter to that:

- a. is postmarked by **March 5, 2026**;
- b. includes the name and case number for this case: *Savannah Thompson et al. vs. John Muir Health, Inc., Contra Costa Superior Court Case No. C22-02125*.
- c. includes your full name, address and telephone number, and email address (if you have one);
- d. states the reasons for your objection;

- e. says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- f. your signature.

Mail the letter to:

*John Muir Health Class Action*  
c/o Settlement Administrator  
P.O. Box 2467,  
Portland, OR 97208-2467

Contra Costa Superior Court  
Department 39  
725 Court St  
Martinez, CA 94553

## 8. How Class Members can object to the settlement.

The court has appointed the following law firms and attorneys as the "Class Counsel" to serve as the attorneys for the Class Members:

<p>Thomas E. Loeser, Cal Bar No. 202724 COTCHETT, PITRE &amp; MCCARTHY, LLP 999 N. Northlake Way, Suite 215 Seattle, Washington 98103 Tel: (206) 802-1272 Fax: (650) 697-0577 tloeser@cpmlegal.com</p>	<p>Peter B. Fredman, Cal Bar No. 189097 LAW OFFICE OF PETER FREDMAN PC 2930 Domingo Avenue #227 Berkeley, CA 94705 Tel: (510) 868-2626 Fax: (510) 868-2627 peter@peterfredmanlaw.com</p>
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These are the attorneys who negotiated the settlement on behalf of the Class Members. If you are a Class Member, these attorneys represent you as part of the class, unless you timely exclude yourself from the class. You also have the right to hire your own attorney at your own expense.

## 9. How are Class Counsel paid?

To date, Class Counsel have not been paid for their work or expenses bringing this lawsuit. As part of the settlement, in addition to the settlement benefits to the Class Members, John Muir has also agreed to pay their reasonable attorney fees and expenses not to exceed \$600,000.00. The actual amount of the attorney fees and expenses that these attorneys will be awarded will be determined by the court based on a fee application that they will file, to which John Muir has the right to object. Class Members have the right to object to the attorneys' fees application even if they think the settlement terms are fair.

## 10. Could it cost me anything to be a Class Member?

No. Class Members are not responsible for any costs regardless of the outcome of the lawsuit.

## 11. How can I get more information about this lawsuit and settlement?

This website includes links to key litigation documents, including the settlement agreement, and will be updated periodically as new information or key documents become available.

Complete copies of all public pleadings, court rulings, and other filings in this lawsuit are available for review by accessing the court docket in this case as follows:

Go to <https://odyportal.cc-courts.org/portal>  
Click on Smart Search for Court Records  
Enter the case number: C22-02125

**Please do not contact the court regarding the Lawsuit.** If you cannot find the information you need, you can contact the administrator by email at [info@JohnMuirHealthClassactionsettlement.com](mailto:info@JohnMuirHealthClassactionsettlement.com) or Class Counsel at the addresses and/or telephone numbers above.