

NOTICE OF CLASS ACTION SETTLEMENT

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Medical Management of Chicago, LLC d/b/a USA Clinics Group, Case No. 2026-001894-CA-01

If from June 12, 2021 through June 16, 2026, you received more than one text message from medical Management of Chicago, LLC d/b/a USA Clinics Group, after opting out or while your number was listed on the National Do Not Call Registry (“DNC”), you may be entitled to a payment from a Class Action Settlement.

A State Court authorized this Notice of Settlement. This is not a solicitation from a lawyer.

A settlement has been proposed (the “Settlement” or “Settlement Agreement”) with Defendant Medical Management of Chicago, LLC d/b/a USA Clinics Group (“USA Clinics Group”) in a class action lawsuit involving allegations of violation to the Telephone Consumer Protection Act (“TCPA”). The Settlement resolves a lawsuit where Class Members allege to have received text messages sent by or on behalf of USA Clinics Group within any 12-month period after the person communicated that they did not wish to receive text messages by replying to the messages with a “stop” or similar opt-out instruction, or while their telephone number was listed on the DNC and they did not provide their consent.

USA Clinics Group is a private health care services company headquartered in Illinois and denies all allegations and wrongdoing in the lawsuit. The Court has not decided who is correct.

USA Clinics Group has agreed to make available up to \$574,350.00 (the “Settlement Fund”) to pay Settlement Class Members who submit valid Claim Forms, as well as notice and administration costs, any attorneys’ fees and expenses awarded by the Court, and any service award approved for the class representative.

Settlement Class Members who file a valid Claim Form will receive up to \$50.00 per text message (with a cap of three messages per person). Settlement Class Members may only submit one Claim Form, which will cover all of their text messages to any of their telephone number(s).

Your legal rights are affected even if you do nothing. Read this Notice of Settlement carefully.

Questions? Call 1-833- 421-7311 Toll-Free or Visit www.usaclinicsgrouptcpsettlement.com

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
Submit A Claim Form	You must submit a claim form in order to receive a Settlement payment. Your claim form must include your LoginID found on the postcard notice sent to you or available from the Settlement Administrator. By submitting a claim, you will give up the right to ever be part of any other lawsuit against USA Clinics Group about the telemarketing legal claims released in this lawsuit. For more detailed information, <i>see</i> Question 7.	October 5, 2026
Exclude Yourself from the Settlement	You can exclude yourself from the Settlement by informing the Settlement Administrator that you want to “opt-out” of the Settlement. This is the only option that allows you to be part of any other lawsuit against USA Clinics Group about the telemarketing legal claims released in this lawsuit. If you opt-out, you may not make a claim for payment under the Settlement. For more detailed information, <i>see</i> Question 14.	August 19, 2026
Object to the Settlement	You may object to the Settlement by writing to explain to the Court why you don’t think the Settlement should be approved. For more detailed information, <i>see</i> Question 15.	August 19, 2026
Attend a Hearing	You may ask to speak in Court at the Final Approval Hearing about the fairness of the Settlement. For more detailed information, <i>see</i> Question 16.	September 18, 2026
Do Nothing	If you do nothing, you will not be entitled to the Settlement payment. By doing nothing, you will give up the right to ever be part of any other lawsuit against USA Clinics Group about the telemarketing legal claims released in this lawsuit. For more detailed information, <i>see</i> Question 18.	No Deadline

These rights and options – **and how and when you need to exercise them** – are explained in this Notice of Settlement.

The Court that is presiding over this case still must decide whether to grant final approval of the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals are resolved.

Questions? Call 1-833- 421-7311 Toll-Free or Visit www.usaclinicsgrouptcpsettlement.com

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BASIC INFORMATION

1. What is this Notice, and why did I get it?

The purpose of this Notice is to let you know that a proposed settlement has been reached in the above class action lawsuit. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Settlement. Because your legal rights will be affected by this Settlement, it is extremely important that you read this Notice carefully. This Notice summarizes the Settlement and your legal rights under it.

For information on how to determine if you are a Settlement Class Member, and therefore eligible for benefits under this Settlement, *see* Question 5.

2. What is this lawsuit about?

The Class Representative in this lawsuit alleges that USA Clinics Group violated the TCPA by sending more than one text message, from June 12, 2021 to June 16, 2026, within any 12-month period concerning USA Clinics Group's products and services to cellular telephone numbers after its customers had opted out from receiving such solicitations or while their telephone numbers were listed on the DNC and they did not provide their consent to be contacted. The Court has certified one class for settlement purposes only (the "TCPA Class"). The Honorable Spencer Eig of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (the "Court") oversees this class action. USA Clinics Group denies that it did anything wrong and denies that this lawsuit should be certified as a class action in litigation. The Court has not decided who is correct.

3. What is a Class Action?

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All of these people are a class, or class members. One court resolves the issues for all class members, except those who exclude themselves from the Class.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiff or USA Clinics Group on USA Clinics Group's alleged liability under the TCPA. Instead, both sides agreed to a settlement of the legal claims in the complaint to avoid the cost of a trial, the risk and uncertainty of proceeding forward in the lawsuit, and to provide compensation for Settlement Class Members. The class representative and Class Counsel (*see* Question 11) believe that the Settlement is in the best interests of the Settlement Class.

WHO IS PART OF THIS SETTLEMENT?

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

The Court has defined the Settlement Class as:

TCPA Class: From June 12, 2021 to June 16, 2026, all persons in the United States who (1) were sent more than one text message by or on behalf of Defendant within any 12-month period; (2) regarding Defendant's goods or services, to said person's cellular telephone number; (3) after the person communicated to Defendant that they did not wish to receive text messages by replying to the messages

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with a “stop” or similar opt-out instruction; or (4) where the person’s telephone number had been listed on the National Do Not Call Registry for at least thirty days and that person did not provide Defendant with his or her prior express invitation or permission.

If you received notice regarding this Settlement via email or postcard it is because records indicate your number was texted by USA Clinics Group and therefore you may be a member of the Settlement Class. If you have questions about whether you are in the Settlement Class, you may call 1-833-421-7311 or visit www.usaclinicsgroupcpasettlement.com for more information.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

USA Clinics Group agrees to make up to \$574,350.00 available to

- (i) pay Settlement Class Members who submit valid Claim Forms;
- (ii) pay notice and administration costs;
- (iii) pay attorneys’ fees and costs awarded to Class Counsel; and
- (iv) any service award approved for the class representative. Settlement Class Members who submit a timely, valid, complete, and verified Claim Form will receive a payment of up to **\$50.00** per text message with a cap of *three messages* per person

Settlement Class Members may only submit one Claim Form, which will cover all text messages (up to three) to any of their telephone number(s). If the Settlement Fund is insufficient to pay \$50.00 for each text message for all approved claims, the per-message amount will be uniformly reduced on a pro rata basis so that the total of all payments, together with any Court-approved attorneys’ fees and expenses, notice and administration costs, and any service award, does not exceed the Settlement Fund. In other words, your payment could decrease depending on the number of valid Claim Forms Settlement Class Members submit and the amount of the Settlement Fund available to pay claims. If, after all distributions are made, any money remains in the Settlement Fund, then the Settlement Administrator will return the remaining money in the Settlement Fund to USA Clinics Group.

* * *

The Settlement Administrator will decide if your claim for payment is valid and will determine the number of your text messages using USA Clinics Group’s records. Only valid claims submitted by the Claim Deadline of **October 5, 2026** will be paid.

HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM

7. How do I file a claim for payment?

To qualify for payment, you must submit a valid Claim Form by **October 5, 2026**. You will need to file a claim form with your LoginID, which can be found on the postcard Notice of Settlement you received or by contacting the Settlement Administrator.

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There are multiple ways to submit a Claim Form. The easiest way to submit a claim form is online, by filling out the form at **www.usaclinicsgrouptcpasettlement.com**. You can also download a paper claim form and return a completed claim form by mail addressed to:

USA Clinics Group TCPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

Read the instructions on the Claim Form carefully, fill out the form, sign it, and submit it online or mail it **postmarked** no later than **11:59 p.m. Eastern on October 5, 2026**.

A paper Claim Form is also available upon request by calling the Settlement Administrator at 1-833-421-7311.

8. How will claims be decided?

The Settlement Administrator will decide whether the information provided on each Claim Form is complete and valid. The Settlement Administrator may require additional information. If you do not provide the additional information in a timely manner the claim will be considered invalid and will not be paid.

Approved claims are those submitted in a timely manner and found to be valid by and in an amount approved by the Settlement Administrator.

9. When will I get my payment?

The Court will hold a hearing on **September 18, 2026** to decide whether to approve the Settlement. If the settlement is approved, appeals may still follow. It is always uncertain whether these appeals can be resolved and resolving them can take more than a year. No payments will be made until the Court approves the Settlement at the hearing and all appeals are final. Please be patient.

LEGAL RIGHTS RESOLVED THROUGH THE SETTLEMENT

10. What am I giving up as a Settlement Class Member?

Unless you exclude yourself, you will remain in the Settlement Class as a Settlement Class Member. That means you cannot sue, continue to sue, or be part of any other lawsuit against USA Clinics Group regarding any text messages received from USA Clinics Group from June 12, 2021, to June 16, 2026, including, but not limited to, claims asserted in the lawsuit or arising out of the facts and circumstances asserted in the lawsuit.

If the Settlement is approved and becomes final and not subject to appeal, then you and all Settlement Class Members will release all “Released Claims” against all “Released Parties.” It also means that all of the Court’s orders will apply to you and legally bind you. The Settlement Agreement (available at www.usaclinicsgrouptcpasettlement.com) describes the legal claims you are releasing (the “Released Claims”) and against whom you are releasing legal claims (“Released Parties”) in detail, so read it carefully.

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To summarize, the release includes, but is not limited to, TCPA claims arising out of or related to any text messages received from USA Clinics Group during the Class Period, including claims related to text messages sent to telephone numbers on the National Do Not Call Registry, text messages sent after opt-out requests, and any other federal or state telemarketing laws.

If you have any questions, you can contact the Settlement Administrator (*see* Question 19).

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court has appointed Christopher Berman of Shamis & Gentile, P.A. and Scott Edelsberg of Edelsberg Law, P.A. to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be personally charged by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. How will the lawyers be paid?

Class Counsel will ask the Court to approve payment of 33.33% of the Settlement Fund of \$574,350.00. This payment will compensate Class Counsel for investigating the facts, litigating the lawsuit, and negotiating the settlement. The Court will decide the amount of fees and costs and expenses to be paid. You will not have to separately pay any portion of these fees yourself. Class Counsel's request for Attorneys' Fees and Costs (which must be approved by the Court) will be filed by **August 19, 2026**, and will be available to view on the Settlement website at www.usaclinicsgrouptcpasettlement.com.

13. Will the Settlement Class Representative receive additional money?

The Settlement Class Representative in this action is listed in the Settlement Agreement, which is available at www.usaclinicsgrouptcpasettlement.com. Class Counsel also will request a service award of up to \$5,000.00 for the named Plaintiff to compensate for the time and effort in pursuing this lawsuit on behalf of the Settlement Class. This amount will have to be approved by the Court, and the Court may award less than these amounts.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I exclude myself from the Settlement?

If you do not want a payment from this settlement, but you want to keep the right to sue or continue to sue USA Clinics Group, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself—or is sometimes referred to as “opting out” of the Settlement Class.

IMPORTANT: You will be bound by the terms of the Settlement Agreement unless you submit a timely and signed written letter requesting to be excluded from the Settlement.

To be valid, your letter must contain the following information:

- (i) The case name of the Action: *Christopher Simpkins v. Medical Management of Chicago, LLC d/b/a USA Clinics Group, d/b/a USA Clinics Group Permanente*, Case No. 2026-001894-CA-01 settlement;
- (ii) your name, address and telephone number

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- (iii) your current phone number and any telephone number(s) at which you received a text message from USA Clinics Group;
- (iv) a statement that you wish to be excluded from the Settlement Class in this action; and
- (v) your signature.

To exclude yourself from the Settlement you must mail a “request for exclusion,” postmarked no later than **August 19, 2026**, to:

USA Clinics Group TCPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799

You cannot exclude yourself on the phone or by fax or email. If you ask to be excluded, you will not get any payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit. Mass requests for exclusion are not allowed.

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court that I Object to the Settlement Agreement?

If you are a Settlement Class Member and do not exclude yourself from the Settlement Class, you may object to the settlement if you do not like any part of it. You may give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file a written objection with the Court and mail a copy to the Settlement Administrator.

The written objection must contain information sufficient to allow the parties to confirm that you are a member of the Settlement Class, including:

- (i) The case name and number: *Christopher Simpkins v. Medical Management of Chicago, LLC d/b/a USA Clinics Group*, Case No. 2026-001894-CA-01;
- (ii) Your full name, address, telephone number, and personal signature;
- (iii) Information sufficient to confirm that you are a Settlement Class Member, including the telephone number at which you received a text message from USA Clinics Group;
- (iv) A statement of your specific objections, and a detailed statement of the factual and legal basis for such objections;
- (v) The identity of all witnesses, including the witness’s name and address, and a summary of such witness’s proposed testimony and documents that you would like the Court to consider;
- (vi) The name and contact information of any attorney you intend to have assert your objections before the Court;
- (vii) A statement identifying the number of class action settlements you objected to in the last five years, and listing those cases by case name and number; and
- (viii) A statement indicating whether you and/or your attorney(s) intend to appear at the Final Approval Hearing. If your attorney intends to appear at the Final Approval Hearing they must enter a written Notice of Appearance of Counsel with the Clerk of the Court no later than the date set by the Court in its Preliminary Approval Order and include the full caption and case number of each previous class action case in which such counsel has represented an objector. If you are represented by counsel and your counsel intends to speak at the Final Approval Hearing, the written objection

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must include a detailed statement of the specific legal and factual basis for each and every objection and a detailed description of any and all evidence you may offer at the Final Approval Hearing, including copies of any and all exhibits that you may introduce at the Final Approval Hearing.

For your objection to be valid, it must meet each of these requirements.

To be considered by the Court, you must file your complete objection with the Court by **August 19, 2026**. You must also send a copy of the objection to the Settlement Administrator.

Court	Settlement Administrator
Christopher Simpkins v. Medical Management of Chicago, LLC d/b/a USA Clinics Group Case No. 2026-001894-CA-01. North West 1st AVE, Miami, FL 33128	USA Clinics Group TCPA Settlement c/o Settlement Administrator P.O. Box 25226 Santa Ana, CA 92799

If you do not comply with these procedures and the deadline for objections, you may lose any opportunity to have your objection considered at the Final Approval Hearing or otherwise to contest the approval of the settlement or to appeal from any orders or judgments entered by the Court in connection with the proposed settlement. You will still be eligible to receive settlement benefits if the settlement becomes final even if you object to the settlement.

THE COURT'S FAIRNESS HEARING

16. When is the Court's Final Approval Hearing?

The Court will hold the Final Approval Hearing at 12:00PM EST on September 18, 2026, before the Honorable Spencer Eig of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, via Zoom. The purpose of the hearing is for the Court to determine whether the settlement is fair, reasonable, adequate, and in the best interests of the Settlement Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed settlement, including those related to the amount requested by Class Counsel for attorneys' fees, costs, and expenses, and the service award to the class representative. After the hearing, the Court will decide whether to approve the settlement. It is unknown how long these decisions will take.

Please note that the date and time of the Final Approval Hearing is subject to change by Court Order. Any changes will be posted on the Settlement Website, www.usaclinicsgrouptcpasettlement.com.

17. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to attend the hearing to talk about it. As long as your written objection was filed by the deadline, and meets the other criteria described above and in the Settlement Agreement, the Court will consider it. You may also pay a lawyer to attend, but you do not have to.

If you do not exclude yourself from the Settlement Class, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement Agreement. If you filed an objection and

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intend to appear at the hearing, you must state your intention to do so in your objection. To speak, you must state that in your objection. Be sure to include your name, address, telephone number, that you are a Class Member, and your signature. You cannot speak at the hearing if you exclude yourself.

IF YOU DO NOTHING

18. What happens if I do nothing at all?

If you do nothing, you will get no money from this settlement. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against USA Clinics Group about the legal issues released in this lawsuit.

GETTING MORE INFORMATION

19. How do I get more information?

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You may review the Settlement Agreement on the Settlement Website at www.usaclinicsgrouptcpasettlement.com.

You can also get a copy of the Settlement Agreement by writing to Class Counsel. You may also contact the Settlement Administrator at 1-833-421-7311 toll free; write to USA Clinics Group TCPA Settlement, P.O. Box 25226, Santa Ana, CA 92799; or visit the website at www.usaclinicsgrouptcpasettlement.com where you will find answers to common questions about the settlement, a Claim Form, plus other information to help you determine whether you are a member of the Settlement Class.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR USA CLINICS GROUP WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.

Questions? Call 1-833- 421-7311 Toll-Free or Visit www.usaclinicsgrouptcpasettlement.com