

You could get money from a class action settlement about payment of medical expenses under Liberty auto policies.

A settlement has been reached in a class-action lawsuit called *Lebanon Chiropractic Clinic, P.C. v. Liberty Mutual Insurance Company, et al.*, Case No. 14-L-521 in the Circuit Court of St. Clair County, Illinois, challenging the use of computerized bill-review systems by Liberty Mutual Insurance Company and several of its affiliates (collectively, "Liberty") to limit payments to medical providers and injured people for medical treatments covered under personal auto policies. The settlement pays money to eligible people who submit valid claim forms.

The Circuit Court of St. Clair County, Illinois, will have a hearing to decide whether to give final approval to the settlement so that payments can be made. Those included in the class action, together called a "Class," may ask for a payment, exclude themselves from the settlement, object to it, or ask to speak at the hearing. There is a detailed notice available by calling toll free or going to the website below.

WHO'S INCLUDED?

Liberty's records indicate you may be a Class member if you received this in the mail.

The settlement includes these "Liberty" insurers: Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company, The First Liberty Insurance Corporation, Liberty Personal Insurance Company, Liberty Insurance Corporation, Liberty Lloyds of Texas Insurance Company, LM General Insurance Company, LM Personal Insurance Company, Safeco Insurance Company of America, Safeco Insurance Company of Illinois, Safeco Insurance Company of Indiana, Safeco Insurance Company of Oregon, Safeco National Insurance Company, Safeco Surplus Lines Insurance Company, General Insurance Company of America, First National Insurance Company of America, American States Insurance Company, American States Preferred Insurance Company, and American Economy Insurance Company.

The settlement includes personal auto policies delivered by a Liberty insurer to policyholders in the following "Settlement States": Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, District of Columbia, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, North Carolina, North Dakota, Ohio, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, Washington, Wisconsin and Wyoming.

You may be in one or more "Subclasses" if:

Policyholder Subclass: On October 31, 2014, you were a named insured under a personal auto policy that was issued by Liberty in one of the Settlement States and provided Medical Payments ("MedPay") or Personal Injury Protection ("PIP") coverage. Liberty policyholders may also be in the Claimant Subclass.

Claimant Subclass: During the period from June 25, 2004, through October 31, 2014, you suffered injuries that were covered by MedPay or PIP coverage under a Liberty policy issued in a Settlement State; received medical treatment for those injuries; sought payment for the treatment through a Liberty policy (or allowed someone else to seek payment on your behalf); and received from Liberty a total payment that was less than the amount billed for that treatment. You don't have to be a Liberty policyholder to be in the Claimant Subclass.

Provider Subclass: During the period from June 25, 2004, through October 31, 2014, you provided medical treatment to a member of the Claimant Subclass; sought payment under the MedPay or PIP coverage provided by a Liberty policy; and received from Liberty a total payment that was less than the amount billed for that treatment.

Also, to be a Claimant or Provider Subclass member, the amount paid to you by Liberty must have been based on Liberty's determination that the amount billed for that treatment exceeded the usual, customary, or reasonable allowance for that treatment.

Not sure if you are included? Get the detailed notice which tells you even more about who is included.

WHAT DOES THE SETTLEMENT PROVIDE?

The settlement will pay cash to eligible Claimant and Provider Subclass members who timely submit properly completed claim forms. Although there is no cap on the total amount of such payments, Liberty estimates that the total payable to Claimant and Provider Subclass members in accordance with the Settlement is approximately \$3.6 million.

Also, over the next five years, Liberty will use agreed-upon methods to adjust MedPay and PIP claims, and publicize those methods on www.LibertyMutual.com and in materials provided to policyholders, claimants, and medical providers. A settlement agreement, available at the website or by calling toll free 1-866-591-7240, describes all of the details about the proposed settlement. The Court did not decide that Liberty did anything wrong. Instead, Liberty agreed to resolve the case and give benefits to the Class.

HOW MUCH COULD YOU GET?

Payments to eligible Claimant and Provider Subclass members will be 50% of the amount of money that you show you lost as a result of the "differences" described below.

Policyholder Subclass: To get a payment you must be a Claimant or Provider Subclass member.

Claimant Subclass: If you paid any portion of the difference between a) the amount billed for a treatment and b) the amount Liberty reimbursed for that treatment through Liberty's use of Ingenix MDR databases, you're eligible for 50% of that difference you paid.

Provider Subclass: If you did not collect (from your patient or any other source) the full amount of the difference between a) the amount billed for covered treatment of a member of the Claimant Subclass and b) the amount Liberty reimbursed for that treatment as a result of its use of Ingenix MDR databases, you're eligible for 50% of that difference that you did not collect from any source.

HOW DO YOU ASK FOR A PAYMENT?

Complete the appropriate claim form and mail it with the documents it asks for, postmarked by **April 6, 2015**, to the address on the form. Get a claim form by calling 1-866-591-7240 or going to www.LebanonPipSettlement.com.

WHAT ARE YOUR OTHER OPTIONS?

If you don't want a payment from this settlement, and you don't want to be legally bound by it, you must exclude yourself by **January 22, 2015** or you won't be able to sue Liberty about the claims in this case ever again. If you ask to be excluded, you can't get a payment from this settlement. If you stay in the settlement, you may object to it by **January 22, 2015**. The detailed notice explains how to exclude yourself or object.

The Court will hold a hearing in this case (*Lebanon Chiropractic Clinic, P.C. v. Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company, Liberty Insurance Company of America, and Liberty Insurance Company of Illinois*, Case No. 14-L-521) on **February 5, 2015**, to consider whether to approve the settlement, and a request by the lawyers representing Class members (including Robert W. Schmieder II and Bradley M. Lakin of SL Chapman LLC in St. Louis, MO) for attorneys' fees, costs and expenses of up to \$1,200,000, and an award of up to \$3,000 for Lebanon Chiropractic Clinic, P.C., who is a Class member like you and was appointed by the Court to represent Class members in the case. Any fees, costs, expenses and payments that the Court approves will be paid separately by Liberty. You or your own lawyer may ask to appear and speak at the hearing, at your own cost, but you don't have to. If the Court approves the settlement, Liberty will be released from all liability for the claims in this case. The settlement agreement explains this fully.

HOW DO YOU GET MORE INFORMATION?

To learn more, call toll free, visit the website, or write to Liberty Lebanon Claims, P.O. Box 1986, Faribault, MN 55021-6182.

1-866-591-7240

www.LebanonPipSettlement.com