

A proposed settlement has been reached in *Lebanon Chiropractic Clinic v. Liberty Mutual*, Case No. 14-L-521 in the Circuit Court of St. Clair County, Illinois, and your rights could be affected.

The lawsuit alleges that Liberty Mutual affiliated insurers (“Liberty”) improperly adjusted claims for payment of medical expenses under Medical Payments (“MedPay”) and Personal Injury Protection (“PIP”) coverage provided by personal auto policies issued in 39 “Settlement States.” Liberty denies these allegations. *See* the website for the affiliated insurers and the Settlement States.

You might be included in the settlement between Liberty and three “subclasses”: “Policyholders,” “Claimants,” and “Providers.” Policyholders are people who, on October 31, 2014, were named insureds under personal auto policies that provided MedPay and/or PIP coverage and were issued by Liberty in the “Settlement States.” Claimants are people who filed claims for MedPay and/or PIP benefits under such policies between June 25, 2004 and October 31, 2014, and Providers are doctors and others who treated Claimants.

Liberty will pay cash to eligible Claimants and Providers. Also, Liberty will use agreed methods to adjust MedPay and/or PIP claims in the future and publicize those methods on its website and in materials provided to Policyholders, Claimants, and Providers. *See* claims filing information at the website below.

The Court will hold a hearing on **February 5, 2015**, to consider approval of the settlement. The Court will also consider at that hearing a request by the lawyers representing the Class (Robert Schmieder II and Bradley Lakin of SL Chapman) for an award of up to \$1,200,000 in attorneys’ fees and expenses and up to \$3,000 in incentive fees for the class member appointed to act as the Class Representative. 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 settlement is approved it will release Liberty from liability for the claims in the case.

If you don’t want to be legally bound by this settlement, you must exclude yourself by **January 22, 2015**. If you don’t exclude yourself, you won’t be able to sue Liberty about the claims in this case ever again. If you do not exclude yourself, you may object to the settlement by **January 22, 2015**. The detailed notice explains how to exclude yourself or object. To learn more:

1-866-591-7240

LebanonPipSettlement.com