Unique ID: «ID»
Class Member Code: «Passcode»

If you had spine surgery performed by Dr. Jason Dreyer while under general anesthesia at either MultiCare Deaconess Hospital or MultiCare Valley Hospital in Spokane County between July 23, 2019 through March 10, 2021, you are eligible for a cash payment from a class action settlement.

This is a court-approved legal notice. It is not a solicitation from a lawyer.
Para la notificación en español, visite nuestro sitio web, www.MultiCareSpineSettlement.com.

A $55.5 million settlement has been reached in a class action lawsuit with MultiCare Health System, Inc. (also d/b/a MultiCare Deaconess Hospital, MultiCare Valley Hospital, MultiCare Rockwood Clinic, & MultiCare Rockwood Clinic Neurosurgery & Spine), as well as Jason A. Dreyer DO and Laura Dreyer (together, "Defendants"). The settlement was reached to avoid the costs, risks, and uncertainty of continued litigation. Plaintiffs allege that Defendants' actions resulted in damages due to an alleged pattern of medically unnecessary or improper spine surgeries as performed by Dr. Jason Dreyer at the MultiCare Deaconess and Valley hospitals in Spokane County. Defendants deny those allegations and deny any liability. The Court has not determined that Defendants did anything wrong or that any law has been violated, and the Settlement is not an admission of liability by Defendants.

The purpose of this Notice is to provide information about this Settlement and explain your rights and options.

Who is included?

Records show you are a Class Member, defined as: all persons whose medical records confirm that Dr. Jason Dreyer performed one or more Spine Surgeries on them while under general anesthesia at MultiCare Deaconess Hospital or MultiCare Valley Hospital in Spokane County between July 23, 2019 through March 10, 2021.

What does the settlement provide?

As a Class Member, or as the authorized representative of an incapacitated Class Member or a deceased Class Member's estate, you can submit a Claim Form online **at www.MultiCareSpineSettlement.com** by **January 4, 2027** for the following cash payments:

Tier 1: You may submit a Claim Form without supporting documentation from you to receive a cash payment in the amount of $2,000 per patient Class Member.

Tier 2: You may submit a Claim Form without supporting documentation from you if you contend your spine surgery was unnecessary or negligently performed to receive a pro rata (a legal term meaning equal share) cash payment. The cost to review your Tier 2 Claim will be funded with your $2,000 Tier 1 cash payment.

Tier 3: You may submit a Claim Form with supporting documentation from you if you contend you suffered extreme and egregious harm to receive a pro rata cash payment up to $750,000 per Tier 3 Class Member. The cost to review your Tier 3 Claim will be funded from your Tier 2 payment.

A deceased Class Member's estate is eligible for Tier 1 or Tier 2 only.

Cash Payments for Valid Claims under Tier 2 and Tier 3 may be subject to a pro rata share (a legal term meaning equal share) increase or decrease depending on the total value of all Valid Claims to be paid from the Settlement Fund.

Class Member Payments may be subject to liens, reimbursement claims, court ordered garnishments, judgments, or other legal obligations including claims by health care insurers for reimbursement of medical expenses paid by the insurer, including, but not limited to, Medicare, Medicare Advantage, Medicaid or other government sponsored plans. Class Members are individually responsible for resolving any such financial obligations that may apply. Each Class Member has an independent legal obligation under federal law, including, but not limited to, 42 C.F.R. § 411.24, to satisfy any Medicare claim, lien or interest, against that class member individually, which is each Class Member's sole and separate obligation. By not opting out of the Class, each individual Class Member acknowledges with regard to any lien or subrogation claims asserted against that individual Class Member's award that the individual Class Member will defend, indemnify, and hold harmless the Defendants from and against all private causes of action or lien and subrogation claims, including all costs and attorney's fees incurred in the defense of such claims, up to that Class Member's individual settlement recovery allocation minus subrogation amounts already paid. Cash payments on a claim will not be made by the Settlement Administrator until the lien or subrogation claim is resolved.

Other options:

If you do not want to be legally bound by the Settlement, you must submit a written notice that you are choosing to opt-out of the Settlement **postmarked** by **January 4, 2027**. If you do not opt-out, you will give up the right to sue and will release Released Parties regarding the legal claims in this lawsuit.

If you do not opt-out, you may object to any aspect of the Settlement, including, without limitation, attorneys' fees, expenses, and Service Awards or specific language in the settlement agreement by filing an objection with the Court by **January 4, 2027**.

The **Long Form Notice** on the Settlement Website www.MultiCareSpineSettlement.com explains how to opt-out or object. If you do nothing, you will get no cash payment, and you will be bound by the Settlement and any judgments and orders. The Court will hold a Final Approval Hearing on **February 2, 2027**, to consider whether to approve the Settlement, Class Counsel's attorneys' fees up to 33% of the settlement fund and expenses, and Service Awards, and to consider any objections. You or your lawyer may attend and ask to appear at the hearing if you object, but you are not required to do so.

When will the money get disbursed?

If you file a valid and timely Claim Form, payment will be provided after the Settlement is approved by the Court and becomes final.

This notice is a summary. Learn more about the Settlement **at www.MultiCareSpineSettlement.com** or call toll free 1-877-313-8724.