

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

E.S., by and through her parents, R.S. and
J.S., and JODI STERNOFF, both on their
own behalf, and on behalf of all similarly
situated individuals,

Plaintiffs,

v.

REGENCE BLUESHIELD; and CAMBIA
HEALTH SOLUTIONS, INC., f/k/a THE
REGENCE GROUP,

Defendants.

NO. 2:17-cv-01609-RAJ

DECLARATION OF ELIZABETH ENLUND
REGARDING CLAIMS PROCESSING

**DECLARATION OF ELIZABETH ENLUND REGARDING
CLAIMS PROCESSING**

I, Elizabeth Enlund, hereby declare and state as follows:

1. I am a Senior Settlement Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I am a certified Project Management Professional (PMP)[®] and hold a Bachelor of Science degree from Portland State University. Prior to joining Epiq in 2019, I managed a variety of complex projects in highly regulated environments through the government and private sectors. The statements of fact in this declaration are based on my personal knowledge

1 and information provided to me by my colleagues in the ordinary course of business, and if called
2 on to do so, I could and would testify competently thereto. I previously executed my *Declaration*
3 *of Elizabeth Enlund Regarding Implementation of Notice* (“Implementation Declaration”) on
4 January 15, 2026, which provided an overview of Epiq’s administration including the
5 implementation of the Notice Plan and provided administrative statistics.

6 2. To summarize and update my Implementation Declaration, a total of 1,072,228
7 Notices (whether short-form or long-form, email or via U.S. mail) were distributed to 932,858
8 potential Settlement Class Members. These Notices reached approximately 98.03% of the
9 intended Notice Recipients.

10 3. This declaration provides updated Settlement administration statistics following the
11 successful implementation of the Court-approved class notice procedures in accordance with the
12 *Agreement to Settle Claims* dated July 31, 2025 (the “Agreement”) and the Court’s *Order* dated
13 October 22, 2025 (the “Order”).
14
15

16 **REQUESTS FOR EXCLUSION**

17 4. Settlement Class Members who wish to be excluded from the Settlement were
18 required to mail a written request for exclusion to Epiq no later than the request for exclusion
19 deadline of March 6, 2026. As of March 10, 2026, Epiq has received seven timely and potentially
20 valid opt out requests. A report listing the seven requests received to date is attached hereto
21 as **Attachment 1**.
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1 **OBJECTIONS RECEIVED**

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3 5. Pursuant to Paragraph 12 of the Order, Settlement Class Members who wished to
4 object to the Settlement were required to submit written objections to the Court no later than the
5 objection deadline of March 6, 2026. As of March 10, 2026, Epiq has received one timely written
6 objection to the Settlement, which was mailed to the Court by Epiq on February 11, 2026.

7 **CLAIMS RECEIVED**

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9 6. Pursuant to 6.4 of the Agreement and paragraph 15 of the Order, Class Members
10 who wished to make a claim were required to submit a completed Claim Form to the Notice and
11 Claims Administrator, either online or via U.S. Mail, so that it was submitted no later than February
12 3, 2026. As of March 10, 2026, Epiq has received 531 timely and late Claim Forms and the total
13 amount of claimed transactions is approximately \$2,119,559.81.¹ To date, the total amount of
14 claimed transactions accepted with substantiation documentation is approximately \$916,381.68,
15 and the average substantiated transaction is \$1,189.82. The dollar amounts of the claims will
16 change once all claims have been adjudicated for verification as set in section 6.4 of the
17 Agreement, including review of transactions and required substantiation documentation.
18

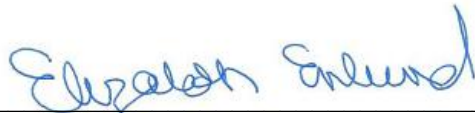
19
20 7. The cost of Class Notice and Epiq's claims administration has totaled \$403,474.08
21 through February 2026.

22 8. *Class Counsel's Motion for Attorney Fees, Litigation Costs, and Case Contribution*
23 *Awards* filed on February 18, 2026, seeks attorney fees, reimbursement of litigation costs, case
24 contribution awards to each of the two Class Representatives. Subtracting these three figures and
25

26
27 ¹ As Epiq is still receiving, reviewing, and processing timely and late claims, the claims information provided herein is subject to
further analysis for eligibility and quality control, and is, therefore, preliminary at this time.

1 Epiq’s anticipated total fees, claims are expected to be paid up to 100% of substantiated
2 transactions, subject to ongoing claims processing, the results of the opportunity-to-cure period,
3 and any potential arbitration process.

4 I declare under penalty of perjury under the laws of the United States and the State of
5 Washington that the foregoing is true and correct and that this declaration was executed on March
6 11, 2026, in Tucson, Arizona.

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10 _____
11 Elizabeth Enlund, PMP
12 Senior Project Manager
13 Epiq Class Action & Claims Solutions, Inc. (“Epiq”)
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Attachment 1

E.S. v Regence BlueShield
Opt Out Report - 3. 10. 2026

Opt Out #	TN	Name
1	414032	Diana Heide
2	651295	Patrick Gilroy
3	881541	Amanda Smith
4	946642	Michael Stoll
5	815187	Leslie Bock
6	811750	Holly Luce
7	951624	Wendy Jacobs

Claims Administrator
ES vs. Regence Blueshield Settlement
P.O. Box 2287
Portland, OR 97208-2287

Jan. 10, 2026

Hello,

I received a postcard for my husband Ernie A. Heide. He passed away on Jan. 21, 2019. I am opting out for him. I tried to go online but my computer would not let me write the word settlement down. I called and this is what I was told to do. I have enclosed copies of the postcard.

Ernie A. Heide/Diana G. Heide

Diana G. Heide



Court-Approved Legal Notice

E.S. v. Regence Blueshield, No. 2:17-cv-1609
United States District Court, Western District of Washington at Seattle

Did you pay for hearing aids or associated medical services while covered by Regence between October 30, 2014, and December 31, 2025? If so, you may have a claim in a class action lawsuit that has tentatively settled. This card describes your rights in that lawsuit and how you can obtain more information, file a claim, or take other action.

*A court authorized this notice.
This is not a solicitation from a lawyer.*

Why Did I Get This Notice?

You received this notice because you might be eligible to participate in a \$3 million settlement if you paid for hearing aids or associated medical care while covered under a health insurance plan issued by Regence between October 30, 2014, and December 31, 2025. You are not a member of the class just because you received this notice. To be a member of the class, you must meet the class definition found here: www.WAHearingAidSettlement.com.

What Can I Do Because of This Settlement?

If you're part of the class, you can: (1) ask for money (file a claim), (2) decide not to participate (opt out), (3) remain in this case but object to the settlement, or (4) do nothing. If you do nothing, you will (a) receive no money and (b) give up any claims you have against Regence related to the issues in this case.

How Do Learn More About This?

You can get more information about the case and your choices at www.WAHearingAidSettlement.com.

How Much Money Could I Get?

If you are a Class Member and file a claim, you may be eligible for payment of a percentage of the costs you paid for hearing aids and associated services from October 30, 2014, through December 31, 2025. Please see www.WAHearingAidSettlement.com for details.

How Do I Make a Claim?

- (1) The best and fastest way is to go online and visit www.WAHearingAidSettlement.com, making sure to follow the instructions;
- (2) Or email us at info@WAHearingAidSettlement.com with your name and address;
- (3) Or call 1-877-706-9538 (Toll-Free), or 1-877-721-6680 (TTY) to obtain more information.

When Do I Need to Do Something?

If you want to file a claim or opt out and not participate in this settlement, you must submit your request electronically or by mail before February 3, 2026.

ALB162 v.04



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 581 PORTLAND, OR

POSTAGE WILL BE PAID BY ADDRESSEE

**ES V REGENCE BLUESHIELD
SETTLEMENT CLAIMS PROCESSING
C/O EPIQ
PO BOX 2287
PORTLAND OR 97208-9939**





SEATTLE WA 980

10 JAN 2026 PM 3 L



ES. vs. Regence Blueshield Settlement
Claims Administrator
PO BOX 2287
Portland OR 97208-2287

97208-228787



January 26, 2026

SENT VIA USPS

E.S. v. Regence BlueShield Settlement Claims Administrator
PO Box 2287
Portland, OR 97208-2287

RE: Opt Out

To whom it may concern:

I wish to opt out of this settlement agreement.

Signed,

A handwritten signature in black ink, appearing to read "Patrick Gilroy", with a long horizontal line extending to the right.

Patrick Gilroy

Two solid black rectangular redaction boxes covering contact information, likely a phone number and an email address.

THE GILROYS

SEATTLE WA 980

27 JAN 2026 PM 4 L



REGENCE SETTLEMENT

PO BOX 2287

PORTLAND, OR 97208-2287

97208-228787



Monroe, Stephanie

From: Amanda [REDACTED]
Sent: Tuesday, February 24, 2026 7:22 PM
To: info_WAHearingAidSettlement
Subject: Re: Hearing aid settlement

Categories: Tracked To Dynamics 365

I would like to opt out

[REDACTED]

Amanda Smith

On Tue, Feb 24, 2026 at 2:25 PM Amanda [REDACTED] wrote:

Why do you need all that information for me to opt out of this?

On Tue, Feb 24, 2026 at 1:46 PM info_WAHearingAidSettlement <info@wahearingaidsettlement.com> wrote:

Dear Amanda,

Please be advised that your Opt Out is missing a signature, your address, and phone number.

The deadline to Opt Out for this Settlement March 6, 2026. Opt Outs may be emailed or sent via mail to:

E.S. v. Regence BlueShield Settlement
Claims Processing
P.O. Box 2287
Portland, OR 97208-2287

Thank you,

Cristina G.
E.S. v. Regence BlueShield Notice and Claims Processor

From: Amanda [REDACTED]
Sent: Thursday, January 22, 2026 7:05 PM
To: info_WAHearingAidSettlement <info@WAHearingAidSettlement.com>
Subject: Re: Hearing aid settlement

You don't often get email from amanditz2010@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

I'm just trying to opt out of this thank you

On Thu, Jan 22, 2026 at 9:39 AM Amanda [REDACTED] wrote:

I'm not interested

On Thu, Jan 22, 2026 at 7:30 AM info_WAHearingAidSettlement <info@wahearingaidsettlement.com> wrote:

Dear Sir or Madam,

Thank you for your email.

We would be happy to research your inquiry. In order to locate your record in our database, please provide the following:

- Your complete name
- Your address
- Your email address
- Any previous addresses that may be associated with your record

If available, please also provide:

- Your Web Confirmation Number
- Your Unique ID

You are not a Class Member simply because you got this notice. If you are not in the Class, you can disregard this notice. You are in the Class if you meet the following definition:

1. You (or a family member) were insured at any time from October 30, 2014, to December 31, 2025, under a Washington health insurance plan that was issued for delivery, or renewed by Regence BlueShield and/or Cambia Health Solutions Inc. or its affiliates or subsidiaries (collectively, "Regence"), that excluded or limited coverage for Hearing Aids and Associated Services, except for insureds enrolled in large group plans from January 1, 2024, to December 31, 2025, and
2. You incurred unreimbursed out-of-pocket expenses in obtaining medically necessary Hearing Aids and Associated Services between October 30, 2014 to December 31, 2025.

All Claim Forms must be received by February 3, 2026.

You may opt out of the settlement. If you opt out, then you may not make a claim or get any benefits from the settlement. If you opt out, your claims against Regence for Hearing Aids and Associated Services during the class period will not be released. To opt out, please go to www.WAHearingAidSettlement.com and follow the instructions, or write to E.S. v. Regence BlueShield Settlement Claims Administrator, PO Box 2287, Portland, OR 97208-2287, saying that you wish to opt out of the agreement, along with your signature.

Your opt out, or exclusion request, must be received by the Notice and Claims Processor no later than March 6, 2026.

Regards,

Virginie B.
E.S. v. Regence BlueShield Notice and Claims Processor

----- Original Message -----

From: Amanda [REDACTED]
Received: Wed Dec 31 2025 21:57:19 GMT-0500 (Eastern Standard Time)
To: info@WAHearingAidSettlement.com <info@wahearingaidsettlement.com>;
Subject: Hearing aid settlement

I didn't buy no hearing aids, I would like to be excluded from this settlement thank you!

From: info_WAHearingAidSettlement

info@wahearingaidsettlement.com

Subject: RE: Opt Out of Class Action Settlement

Date: Feb 3, 2026 at 8:57:17 AM

To: [REDACTED]

Dear Michael J. Stoll,

Thank you for your email.

You may opt out of the settlement. If you opt out, then you may not make a claim or get any benefits from the settlement. If you opt out, your claims against Regence for Hearing Aids and Associated Services *during the class period will not be released. To opt out, please go to www.WAHearingAidSettlement.com* and follow the instructions, or write to E.S. v. Regence BlueShield Settlement Claims Administrator, PO Box 2287, Portland, OR 97208-2287, saying that you wish to opt out of the agreement, along with your signature.

Your opt out, or exclusion request, must be received by the Notice and Claims Processor no later than March 6, 2026.

Regards,

Virginie B.

E.S. v. Regence BlueShield Notice and Claims Processor

----- Original Message -----

→ **From:** Michael Stoll [REDACTED];
Received: Thu Jan 29 2026 04:06:37 GMT-0500 (Eastern Standard Time)
To: info@WAHearingAidSettlement.com <info@wahearingaidsettlement.com>;
Subject: *Opt Out of Class Action Settlement*

Dear Administrator,

I do not wish to participate in the class action lawsuit. I would like to opt out. Please confirm receipt of this request.

My name, claim #, etc are:

MICHAELE J STOLL [REDACTED] 7364 [REDACTED]

Sincerely,

Michael J. Stoll

Michael J. Stoll

[REDACTED]



Ms. Michaela Stoll



SEATTLE WA 980

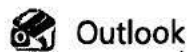
11 FEB 2026 PM 4 L



E.S. v. Regence Blue Shield
Settlement Claims Administrator
P.O. Box 2287
Portland, OR 97208-2287

97208-228787





Opting out

From Leslie Bock [REDACTED]

Date Fri 1/9/2026 5:00 PM

To info_WAHearingAidSettlement <info@WAHearingAidSettlement.com>

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Sent from my iPhone I do not have hearing aids so I am opting out of settlement. I could not find where to do that so I'm contacting you. Sincerely, Leslie Bock

January 21, 2026

Holly Luce

[REDACTED]

[REDACTED]

(ID [REDACTED] 6435, Group 37000402)

E.S. vs Regence BlueShield Notice and Claims Processor

P.O. Box 2287

Portland, OR 97208-2287

I OPT OUT OF THE AGREEMENT

E.S. v BlueShield, No.2:17-ev-1609

United District Court, Western District of Washington at Seattle

Holly Luce

Holly Luce

Case 2:17-cv-01609-RAJ

Document 101

Filed 03/12/26

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E.S. vs Regence BlueShield
Notice and Claims Processor

P.O. Box 2287

Portland, OR

97208-2287

E.S. v. Regence BlueShield Settlement

Claims Processing

P.O. Box 2287

Portland, OR 97208-2287

Dear E.S. v. Regence BlueShield Settlement Claims Administrator:

I, Wendy Jacobs, do hereby opt out of the WA Hearing Aid Settlement.

Thank you,

Wendy Jacobs

[REDACTED]

[REDACTED]

Signature: Wendy Jacobs

Date: 2/24/2026