

ATTENTION: DID YOU PURCHASE A HEARING AID BETWEEN OCTOBER 30, 2014, AND DECEMBER 31, 2025, THAT WAS NOT COVERED BY REGENCE BLUESHIELD?

A SETTLEMENT AGREEMENT MAY AFFECT YOUR RIGHTS.

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

- Two individuals who need hearing aids sued Regence BlueShield and Cambia Health Solutions, Inc. (collectively “Regence”) in a class action lawsuit. Regence excluded hearing aids and associated services in some of its Washington health plans, and the individuals maintain that such exclusions violated the law.
- The two individuals, called the “Named Plaintiffs,” and Regence reached a settlement agreement in which Regence would pay \$3,000,000 to a settlement fund to reimburse Class Members who submit claims for uncovered expenses for hearing aids and associated services incurred from October 30, 2014, through December 31, 2025.
- The U.S. District Court for the Western District of Washington preliminarily approved the settlement agreement and ordered this notice to go to all Regence enrollees in Washington health plans that did not include hearing aid coverage from October 30, 2014, through December 31, 2025.

YOUR LEGAL RIGHTS IN THIS LAWSUIT

You may comment on the proposed agreement.	You have the right to object to or comment on the agreement. The Court will decide whether to approve or reject the proposed agreement after a final hearing currently scheduled for 9:00 am at the United States Courthouse, 700 Stewart Street, Suite #13128, Seattle, WA 98101. You may submit written comments or objections to be considered by the Court no later than March 6, 2026. You should not call the Court.
You may make a claim.	You may submit a claim if you qualify as a Class Member and incurred out-of-pocket costs that were unpaid or unreimbursed by Regence for hearing aids and associated services between October 30, 2014, and December 31, 2025. Claims must be submitted by February 3, 2026. Claim Forms can be accessed at www.WAHearingAidSettlement.com .
You may do nothing.	If you do nothing, your claims will be released. If the agreement is approved, and you qualify as a Class Member, any claims you have against Regence regarding coverage for hearing aids and associated services from October 30, 2014, to December 31, 2025, will be released.
You may ask to be excluded.	Get out of this lawsuit. Get no benefits from it. Keep the right to file your own lawsuit. If you ask to be excluded, you will not receive any money from this lawsuit, but you may file your own lawsuit against Regence for the same legal claims.

FREQUENTLY ASKED QUESTIONS

1. Am I in the class?

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.

Questions? Call or 1-877-706-9538 (Toll-Free) or 1-877-721-6680 (TTY) or visit www.WAHearingAidSettlement.com

2. What is this lawsuit about?

The Named Plaintiffs claim that Regence discriminated against them and other insureds with hearing loss when Regence excluded or provided limited and inadequate coverage of Hearing Aids and Associated Services. They claim that this exclusion violated federal health insurance anti-discrimination law. Regence denied all claims.

3. Why is the lawsuit a class action?

This lawsuit was filed as a class action because many Regence enrollees are in the same position as the Named Plaintiffs. The Named Plaintiffs agreed to serve as Class Representatives on behalf of all enrollees in the same position.

4. What does the proposed Settlement Agreement provide?

You can read the entire proposed agreement at www.WAHearingAidSettlement.com. The following is a summary:

- **\$3,000,000 Settlement Fund**

The agreement requires Regence to pay \$3,000,000 into a settlement fund to reimburse valid and approved charges for Hearing Aids and Associated Services incurred by Class Members between October 30, 2014, and December 31, 2025, attorneys' fees and litigation costs to Class Counsel, arbitration costs, taxes, claims administration, and class notice costs and case contribution awards to the Named Plaintiffs.

- **Claims Process for Unreimbursed Hearing Aids and Associated Services**

To be eligible for payment, you may submit the online claim and certification form, found at: www.WAHearingAidSettlement.com. You can also request that the claim form be mailed to you by calling or 1-877-706-9538 (Toll-Free) or 1-877-721-6680 (TTY).

You will need the following information to fill out and submit a valid claim: (1) the date(s) you received Hearing Aid(s) and/or Associated Services (month/year); (2) the names of provider(s) who sold you the Hearing Aid(s) and/or provided the Associated Services, as well as the provider(s)' addresses and phone numbers, if available; (3) the unreimbursed charges or debt incurred; and (4) documentation showing the payments made or debt incurred for the Hearing Aid(s) and/or Associated Services (unless that information was previously provided to Regence).

You must also sign a certification form attesting that the information provided is true and correct.

Class Members who previously submitted to Regence claims for Hearing Aids or Associated Services that were denied do not need to resubmit those documents. Those Class Members may access an online pre-populated claim form that they must verify to receive payment.

A Notice and Claims Processor will review the claims to confirm that all of the required information is included. If you submit incomplete information, the Notice and Claims Processor will provide you with notice and an opportunity to correct any problems with the claim. You can get free help from Class Counsel when submitting your claim by emailing Class Counsel at WAHearingAidSettlement@sylaw.com.

- **Attorneys' Fees, Litigation Costs, and the Costs of Claims Administration**

Class Counsel may apply for attorneys' fees to be paid out of the settlement fund. Class Counsel can seek a fee up to, but not exceeding, 35% of the fund and will make a motion for an award of fees on or before February 18, 2026. This motion will be posted on the webpage, www.WAHearingAidSettlement.com. Litigation costs, arbitration costs, costs for claims administration, class notice costs incurred and any taxes due will be paid from the fund. Class Counsel's application for attorneys' fees, and litigation costs will not be paid without the Court's approval.

- **Case Contribution Awards**

The Court may also order up to \$15,000 for each Named Plaintiff as a case contribution award to be paid from the settlement fund. This award is to compensate Named Plaintiffs for the time, effort, and risk they took to pursue the claims in this case.

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- **How Much Could I Get Paid?**

Class Members with valid and approved claims will be paid a percentage (pro rata payment) of their claim, after the \$3,000,000 settlement fund is used to pay attorneys' fees, litigation costs, incentive awards, arbitration costs, taxes, and administration costs. The percentage payment is not yet known.

It is unlikely that excess funds will remain after all payments described in the settlement agreement are made. Any excess funds, up to \$300,000, shall be donated to the Washington State Communication Access Project, a nonprofit organization dedicated to enabling persons who are hard of hearing to fully enjoy public venues. Any remaining excess funds shall be donated to the Legal Foundation of Washington to distribute to charitable organizations dedicated to advocacy on behalf of people who are deaf or hard of hearing.

- **Release of Claims**

Class Members will release Regence from all claims related to the Hearing Aids and Associated Services that were or could have been brought in the lawsuit. This means that if you have any actual or potential claims arising out of Regence's alleged failure to pay for Hearing Aids and Associated Services, those claims will be resolved as part of the agreement, and your right to payment for any damages related to hearing aid coverage will be governed exclusively by the agreement for the period between October 30, 2014, and December 31, 2025.

5. When will the Qualified Settlement Fund be available?

For class claimants with valid and approved claims, payment will occur after: (1) the Court finally approves the Agreement after a fairness hearing; (2) any appeals of the Court's approval is resolved; and (3) all claims are fully adjudicated, so that the percentage payment may be determined.

6. How can I submit a claim, comment, or opt out?

- **You May Make a Claim**

If you incurred out-of-pocket costs in purchasing a Hearing Aid and/or receiving Associated Services, then you may make a claim by completing the online claims forms at www.WAHearingAidSettlement.com.

- **You May Exclude Yourself from the Agreement.**

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.

- **You May Comment on, Object to, or Support the Proposed Agreement.**

The Court will hold a hearing on the proposed Agreement to consider comments and approve or reject the Agreement. The Court currently has scheduled a hearing for March 20, 2026 at 9:00 am. The hearing will be located at United States Courthouse, 700 Stewart Street, Suite #13128, Seattle, WA 98101. The hearing date, time, and location can change without further notice. Please contact Class Counsel to confirm the date and time of the hearing.

You may attend the hearing and may choose to bring a legal representative at your own expense. If you plan to appear at the hearing to comment on the Agreement, you must send the Court a written letter informing them by March 6, 2026. Written comments or a request to appear must be mailed to the following address:

E.S. v. Regence BlueShield Settlement Hearing
United States Courthouse
700 Stewart Street, Suite #13128
Seattle, WA 98101

The Court must receive any such letters no later than March 6, 2026, or they will not be considered. All communications with the Court must be in writing, and Class Members should not attempt to call the Court. You are not required to submit comments.

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