

**NOTICE OF CLASS ACTION SETTLEMENT,
SETTLEMENT FAIRNESS HEARING, MOTION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF
ATTORNEY EXPENSES, AND MOTION FOR SERVICE
AWARDS TO PLAINTIFFS**

This notice advises you of the Settlement of *Goodman, et al., v. Columbus Regional Healthcare System, Inc.*, Case No. 4:21-cv-00015-CDL (M.D. Ga.) (the "Action"), a class action lawsuit brought by Barbara Goodman, Lisa Countryman, Sharon Clarke, Cheryl Gallops, Sherri Stuckey, and Lauren Spivey ("Plaintiffs") on behalf of themselves, the Columbus Regional Healthcare System, Inc. Plan (the "Plan"), and the Members of the "Settlement Class" as defined below against Defendant Columbus Regional Healthcare System, Inc. ("Columbus Regional") (collectively with Plaintiffs, the "Settling Parties"). The Action was brought under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). The Settlement releases Columbus Regional and related parties from any claims filed against it in the Action. The terms and conditions of the Settlement are set forth in a Settlement Agreement (the "Settlement Agreement"). Capitalized terms used in this notice but not defined in this notice have the meanings assigned to them in the Settlement Agreement. The Settlement Agreement and additional information with respect to the Action and the Settlement are available www.ColumbusRegionalERISASettlement.com or by contacting Class Counsel as described below.

The Parties have agreed to settle this case for two million dollars U.S. (\$2,000,000.00) (the "Settlement Amount"). The Court has preliminarily approved the Settlement, which provides for allocation of Settlement funds to Members of the Settlement Class. After payment of attorneys' fees and expenses, costs of notice, fees and expenses of an Independent Fiduciary, fees and expenses of a Settlement Administrator, service awards to the Plaintiffs, if any, and any remaining fees and expenses related to administration of the Settlement, the amount remaining in the account shall constitute the Net Settlement Fund. The Net Settlement Fund will be allocated among Members of the Settlement Class according to a Plan of Allocation to be approved by the Court. Under the proposed Plan of Allocation, each Member of the Settlement Class will receive their *pro rata* share of the Net Settlement Fund based on the Member's account balance (a weighted account balance over the Class Period) divided by the "Plan Balance" (a weighted average of Plan assets over the Class Period) and multiplied by the Net Settlement Fund. Under the proposed Plan of Allocation, a Member's share of the Net Settlement Fund does not depend on their balance in any given investment.

The Court has scheduled a hearing concerning final approval of the Settlement and Class Counsel's motion for attorneys' fees and expenses and for compensation to the Plaintiffs. That hearing, before the Honorable Clay D. Land, is scheduled on June 12, 2024, at 9:30 A.M. in Courtroom 2-A at the United States Federal Post Office & Courthouse, 120 12th Street Columbus, GA 31902. If final approval is granted, the Settlement will bind you as a Member of the Settlement Class. You may appear at this hearing at your own expense and/or object to the Settlement. Any objections to the Settlement or the motion for attorneys' fees and expenses or the motion for service awards to the Plaintiffs must be served in writing on Class Counsel, which will transmit them to the Court. you must submit your comments or objections postmarked no later than May 22, 2024, addressed to James White Firm, LLC, 2100 Morris Avenue, Birmingham, AL 35203 and Williamson & York, LLC, 2727 Paces Ferry Road, SE, Building One, Suite 750, Atlanta, GA 30339. You must state the reasons for your objections, identify any supporting law and evidence, and personally sign your objections. Any Member of the Settlement Class or other person who does not timely serve a written objection complying with the terms of this paragraph shall be deemed to have waived, and shall be foreclosed from raising, any objection to the Settlement and any untimely objection shall be barred. More information about the hearing and how to object is explained below.

YOUR LEGAL RIGHTS WILL BE AFFECTED WHETHER OR NOT YOU TAKE ANY ACTION. READ THIS NOTICE CAREFULLY. PLEASE DO NOT CONTACT DEFENDANT OR THE COURT. THEY WILL NOT BE ABLE TO ANSWER YOUR QUESTIONS.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
You can do nothing. (No action is necessary to receive an allocated payment.)	If the Settlement is approved by the Court and you are a Member of the Settlement Class entitled to a payment under the Plan of Allocation, you do not need to do anything to receive a payment.
You can submit an objection. (It must be mailed and postmarked by May 22, 2024).	If you wish to object to any part of the Settlement, you may write the Parties' counsel and explain why.
You can appear and speak at the Fairness Hearing on June 12, 2024.	If you submit a written objection to the Settlement before the Court-approved deadline and a notice of intent to appear (as described below), you may (but do not have to) speak in Court about the fairness of the Settlement.

- Your rights and options—and **the deadlines to exercise them**—are explained in this notice.
- Information concerning your individual share of the Net Settlement Fund, if any, will not be available for several months after the Court grants final approval of the Settlement and any appeals are resolved. Thank you for your patience.

SUMMARY OF THE CASE

As described in more detail below and in Plaintiffs' Amended Complaint, this Action alleges that Columbus Regional breached fiduciary duties owed to participants and beneficiaries of the Plan during the Class Period. Columbus Regional vigorously denies the allegations. A copy of the Amended Complaint is available www.ColumbusRegionalERISASettlement.com.

SUMMARY OF SETTLEMENT

The Settlement Agreement provides that Columbus Regional will pay or cause its fiduciary insurance carrier to pay \$2,000,000.00 in cash, which will be deposited into an account called the Settlement Fund. After payment of attorneys' fees and expenses, costs of notice, fees and expenses of an Independent Fiduciary, fees and expenses of a Settlement Administrator, service awards to the Plaintiffs, if any, and any remaining fees and expenses related to administration of the Settlement, the amount remaining in the account shall constitute the Net Settlement Fund. The proposed allocation of the Net Settlement Fund to Members of the Settlement Class is described above. The distribution of the Net Settlement Amount will be made according to a Plan of Allocation to be approved by the Court.

STATEMENT OF POTENTIAL OUTCOME OF THE ACTION

Class Counsel believe that the claims against Columbus Regional are well-grounded in law and fact and that breaches of fiduciary duty under ERISA occurred in this case. However, as with any litigated case, Members of the Settlement Class would face an uncertain outcome if the Action were to continue against Columbus Regional. Continued litigation of the Action could result in a range of possible recoveries, including a judgment greater or less than the recovery under the Settlement Agreement, or no recovery at all. Class Counsel also have taken into account the limited availability of insurance.

Class Counsel believe that this Settlement reflects a reasonable compromise in light of the range of possible outcomes. Class Counsel believe that the Settlement is preferable to continued litigation and is in the best interest of the Members of the Settlement Class because the Settlement provides certainty with respect to the amount of recovery and results in a prompt recovery.

Throughout this litigation, Columbus Regional has vigorously denied and continues to deny the claims and contentions alleged by Plaintiffs. Nevertheless, Columbus Regional also has concluded that it is desirable for the Action to be fully and finally settled as to it and the other Releasees on the terms and conditions set forth in the Settlement Agreement.

The Court has not ruled in favor of either side. Both sides agreed to the Settlement to ensure a resolution and avoid the cost and risk of further litigation.

**STATEMENT OF FEES AND EXPENSES INCURRED BY
THE INDEPENDENT FIDUCIARY AND THE SETTLEMENT
ADMINISTRATOR**

An Independent Fiduciary is evaluating the Settlement and will be asked to authorize the Settlement on behalf of the Plan. The fees and expenses incurred by the Independent Fiduciary (including fees and expenses incurred by consultants, attorneys, and other professionals retained or employed by the Independent Fiduciary) in the course of evaluating and authorizing the Settlement on behalf of the Plan will be paid by out of the Settlement Amount.

A Settlement Administrator has been engaged to mail the notice to the Members of the Settlement Class, administer the Settlement and allocate the Net Settlement Fund among Members of the Settlement Class. The fees and expenses for the Settlement Administrator will be paid from the Settlement Fund.

STATEMENT OF ATTORNEYS' FEES AND EXPENSES SOUGHT IN THE ACTION

Class Counsel will submit a motion to the Court in which they will ask the Court to award them attorneys' fees, plus reimbursement of costs and expenses.

STATEMENT OF SERVICE AWARDS TO PLAINTIFFS SOUGHT IN THE ACTION

Class Counsel will submit a motion to the Court in which they will ask the Court to make service awards to the Plaintiffs in recognition of their efforts in prosecuting this action to Plaintiffs Goodman and Countryman in amounts not to exceed Ten Thousand Dollars (\$10,000) each and to Plaintiffs Clarke, Gallops, Stuckey and Spivey in amounts not to exceed Five Thousand Dollars (\$5,000) each.

QUESTIONS AND ANSWERS

Why did I receive a notice in the mail?

You received a notice because you or someone in your family is or may have been a participant in or beneficiary of the Columbus Regional Healthcare, Inc. Plan (the "Plan") at some time between February 2, 2015 and May 31, 2019.

The Court ordered that this notice be sent to you because you have a right to know about the Settlement and all of the options available to you regarding the Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, the

Net Settlement Fund will be allocated among Members of the Settlement Class according to a Court-approved Plan of Allocation.

The Court in charge of this case is the United States District Court for the Middle District of Georgia, Columbus Division. The individuals who sued are called “Plaintiffs,” and the entity they sued is called the “Defendant.” The legal action that is the subject of this notice and the Settlement is titled *Goodman, et al., v. Columbus Regional Healthcare System, Inc., Case No. 4:21-cv-00015-CDL (M.D. Ga.)*.

What is the Action about?

The Action claims that Columbus Regional was a fiduciary to the Plan and violated fiduciary duties under ERISA that it owed to the Plan’s participants and beneficiaries. Plaintiffs allege Columbus Regional breached its fiduciary duties by failing to appropriately monitor and control certain investment fees, recordkeeping fees, and the Plan’s stable value fund option. In the Amended Complaint, Plaintiffs have asserted claims for losses they contend were suffered by the Plan as the result of these alleged breaches of fiduciary duty by Columbus Regional.

Columbus Regional vigorously denies each and every allegation of wrongdoing made in the Amended Complaint and contends that it has no liability in the Action. Columbus Regional specifically denies the allegations that it breached any fiduciary duty or any other provisions of ERISA in administering the Plan.

Why is this case a class action?

In a class action, one or more plaintiffs called “Class Representatives” sue on behalf of a large number of people who have similar claims. All of the individuals on whose behalf the Class Representatives are suing are “Class Members.” One court resolves the issues for all Class Members. In its order setting the Fairness Hearing, the Court preliminarily certified the Settlement Class in the Action.

The Class Representatives in this Action, Barbara Goodman, Lisa Countryman, Sharon Clarke, Cheryl Gallops, Sherri Stuckey, and Lauren Spivey, were participants in the Plan during the Class Period and are referred to as the “Plaintiffs.”

Why is there a settlement?

The Court has not reached any final decision in connection with Plaintiffs’ claims against Defendant. Instead, Plaintiffs and Defendant have agreed to a Settlement. In reaching the Settlement, they have avoided the cost, risks, time, and disruption of prolonged litigation and trial.

Class Counsel believe that the Settlement is the best option for the Settlement Class Members, as described above in the section entitled “Statement of Potential Outcome of the Action.” Columbus Regional has denied and continues to deny the claims and contentions alleged by Plaintiffs. Nevertheless, Defendant has concluded that it is desirable for the Action to be fully and finally settled as to it and the other Releasees on the terms and conditions set forth in the Settlement Agreement and to avoid the cost and risk of further litigation.

How do I know whether I am part of the Settlement?

The Court certified the following Class, and allowed the case to proceed on behalf of everyone in the Class:

All persons who were participants or beneficiaries in the Columbus Regional Healthcare System Retirement Savings Plan (the “Plan”) and had account balances in the Plan as of February 2, 2015 or after, through the termination of the Plan.

The “Settlement Class” consists of all persons who are included in the certified Class. The “Class Period” is defined as February 2, 2015 through May 31, 2019. If you are unsure whether you are a member of the Settlement Class, you may contact Class Counsel.

THE SETTLEMENT BENEFITS

What does the Settlement provide?

The Settlement provides that Defendant and/or Defendant’s insurance carrier will deposit \$2,000,000.00 (the “Settlement Amount”) into an account at a financial institution identified by Class Counsel, which shall constitute the Settlement Fund. The net amount of the Settlement Fund, after payment of Court-approved attorneys’ fees and expenses, awards to the Plaintiffs, if any, and any fees and expenses incurred by the Settlement Administrator (the “Net Settlement Fund”) will be allocated to the Members of the Settlement Class according to a Plan of Allocation to be approved by the Court if and when the Court enters an order finally approving the Settlement.

How much will my payment be?

If you qualify, you will receive a share of the Net Settlement Fund allocated proportionally amongst all Class Members according to a Plan of Allocation to be approved by the Court. The Settlement payment is a compromise. It does not compensate participants for 100% of the losses alleged in the Action.

Class Counsel will file a detailed, proposed Plan of Allocation in advance of the Fairness Hearing. The proposed Plan of Allocation will describe the manner in which the Net Settlement Fund will be distributed to Members of the Settlement Class. If you object to anything in the proposed Plan of Allocation, you may file an objection to the Settlement and explain why you object. Your right to object, to appear at the Fairness Hearing, and the process for objecting are described more fully herein.

The Settlement Administrator will perform all calculations and determine your settlement amount. The Settlement Administrator will have access to all available records, so you do not need to be concerned if you no longer have your account statements. The Court will be asked to approve the Plan of Allocation, a copy of which will be available along with other settlement documents www.ColumbusRegionalERISASettlement.com after it has been filed.

How can I get a payment?

If the Settlement is given final approval, you will **not** have to do anything to get a payment from the Settlement if you are entitled to one under the Plan of Allocation.

When will I get my payment?

The balance of the Net Settlement Fund will be allocated to Members of the Settlement Class pursuant to the Plan of Allocation as soon as possible after final approval has been obtained for the Settlement, including any appeals. Final approval of the settlement may take months and any appeal of the final approval may take a year or more. Please be patient.

There will be no payments if the Settlement is not approved by the Court or is terminated.

The Settlement may be terminated on several grounds, which are described in the Settlement Agreement. In the event any of these conditions occur, there will be no settlement payment made, and the litigation will resume.

Can I opt out of the Settlement?

No. In some class actions, class members have the opportunity to exclude themselves from the Settlement. This is sometimes referred to as “opting out” of the Settlement. Because of the legal issues involved in the Action, however, the class of participants affected by this Settlement has been preliminarily certified as a mandatory class. This means you cannot opt out of the benefits of the Settlement in order to pursue your own claims or for any other reason. **Therefore, you will be bound by any judgments or orders that are entered in this Action, and if the Settlement is approved, you will be deemed to have released Defendant and certain others from any and all claims that were or could have been asserted in this case on your behalf or on behalf of the Plan or that are otherwise included in the Release in the Settlement, other than your right to obtain the relief provided to you, if any, by the Settlement.**

Although you cannot opt out of the Settlement, you can object to the Settlement and ask the Court not to approve the Settlement, as described more fully herein.

THE LAWYERS REPRESENTING YOU

Do I have a lawyer in the Action?

The Court has designated Williamson and York, LLC (Atlanta, Ga.) and the James White Firm, LLC (Birmingham, Ala.) as Class Counsel for the Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense. Please keep in mind the value of your settlement will likely not exceed the cost of hiring your own lawyer.

How will the lawyers be paid?

Class Counsel will file a motion for attorneys’ fees and expenses by May 15, 2024, after which a copy will be posted at www.ColumbusRegionalERISASettlement.com. This motion will be considered at the Fairness Hearing. Defendant has agreed not to oppose the amount of attorneys’ fees, costs, or expenses or any award to the Plaintiffs to the extent such fees, costs, expenses, and awards are consistent with the terms of the Settlement Agreement.

Plaintiffs will also request service awards from the Settlement Fund to compensate them for the risk and time and effort they spent assisting with the investigation and prosecution of the case. Class Counsel will request that the Court approve service awards of up to \$10,000 for each of the Plaintiffs.

You have the right to object to this aspect of the Settlement even if you approve of the other aspects of the Settlement.

OBJECTING TO THE SETTLEMENT OR THE ATTORNEYS’ FEES

You can tell the Court that you do not agree with the Settlement or some part of it.

How do I tell the Court that I object to the Settlement?

If you are a Member of the Settlement Class, you can object to the Settlement if you do not agree with any part of it. You must give reasons why you think the Court should not approve the Settlement. The Court will consider your views. To object, you must send a letter or other written filing saying that you object to the Settlement to Class Counsel’s addresses listed below. Be sure to include the following case caption and notation: “*Goodman, et al., v. Columbus Regional Healthcare System, Inc.*, Case No. 4:21-cv-00015-CDL (M.D. Ga.)”. In addition, your objection must also include your name, address, telephone number, and physical signature and the reasons why you object to the Settlement. **You must personally physically sign your objection even if you retain an attorney to prepare**

the objection or to appear on your behalf. If you retain an attorney, you are responsible for paying that attorney. Mail the objection to the address listed below, postmarked no later than May 22, , 2024. You must mail your objection by this date. If you fail to do so, the Court will not consider your objections. If you plan to speak at the Fairness Hearing, you must send a separate Notice of Intention to Appear along with your objection, as described below.

CLASS COUNSEL

John Williamson
jhw@williamsonyork.com
J. Christopher York
attorneychrisyork@gmail.com
WILLIAMSON & YORK, LLC
2727 Paces Ferry Road, SE
Building One, Suite 750
Atlanta, GA 30339
(678)358-9317

James H. White IV
JAMES WHITE FIRM, LLC
2100 Morris Avenue
Birmingham, Alabama 35203
(205) 317-2551
james@whitefirmlc.com

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but it is not necessary.

When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing to decide whether to approve the Settlement as fair, reasonable, and adequate. You may attend the Fairness Hearing, and you may ask to speak by filing a "Notice of Intention to Appear" as described below, but you do not have to attend. The Court will hold the Fairness Hearing on June 12, 2024 at 9:30 A.M. in Courtroom 2-A at the United States Federal Post Office & Courthouse, 120 12th Street Columbus, GA 31902. If there are timely objections, the Court will consider them. After the Fairness Hearing, the Court will decide whether to approve the Settlement. The Court will also rule on the motions for attorneys' fees and expenses, and for service awards to the Plaintiffs..

Do I have to come to the hearing?

No, but you are welcome to come at your own expense. If you send an objection, you do not have to attend the Fairness Hearing to voice your objection in person. As long as you mail your written objection on time, the Court will consider it when determining whether to approve the Settlement as fair, reasonable, and adequate. You also may pay your own lawyer to attend the Fairness Hearing, but attendance is not necessary. Your recovery under this settlement may not be sufficient to justify the expense of hiring your own lawyer and attending the hearing.

May I speak at the hearing?

Only if you have previously timely filed an objection to the Settlement, as detailed above, may you ask the Court for permission to speak at the Fairness Hearing. To speak at the hearing,

you must send a letter or other paper called a “Notice of Intention to Appear at Fairness Hearing in *Goodman, et al., v. Columbus Regional Healthcare System, Inc.*, Case No. 4:21-cv-00015-CDL (M.D. Ga.)” to Class Counsel at the addresses listed above. Be sure to include your name, address, telephone number, and physical signature. **Your Notice of Intention to Appear must be postmarked no later than May 22, 2024.**

IF YOU DO NOTHING

What happens if I do nothing at all?

If you do nothing and you are a Member of the Settlement Class and the Settlement is approved, you will be included in the Settlement of the Action as described in this notice, and you will be bound by the release of claims agreed to by the Plaintiffs on behalf of the Class as part of the Settlement. .

GETTING MORE INFORMATION

Are there more details about the Settlement?

This notice summarizes the proposed Settlement. The complete Settlement is set forth in the Settlement Agreement. You may obtain a copy of the Settlement Agreement at www.ColumbusRegionalERISASettlement.com.

How do I get more information?

Class Counsel may be reached at :

John Williamson
jhw@williamsonyork.com
J. Christopher York
attorneychrisyork@gmail.com
WILLIAMSON & YORK, LLC
2727 Paces Ferry Road, SE
Building One, Suite 750
Atlanta, GA 30339
(678) 358-9317

James H. White IV
JAMES WHITE FIRM, LLC
2100 Morris Avenue
Birmingham, Alabama 35203
(205) 317-2551
james@whitefirmllc.com

You may obtain a copy of the Settlement Agreement and other documents regarding the lawsuit and Settlement www.ColumbusRegionalERISASettlement.com.

Documents are also available at the office of the Clerk located at United States Federal Post Office & Courthouse, 120 12th Street Columbus, GA 31902.