UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

If you received PBRT for prostate cancer and sought coverage from Anthem but your treatments were not covered by insurance (by Anthem or otherwise), you may be eligible for benefits from a class action Settlement.

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

- A Settlement has been reached in a class action lawsuit against Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. and Anthem Insurance Companies, Inc. (together, "Anthem"), relating to the Action, alleging, among other things, that Anthem improperly denied benefits for proton beam radiation therapy ("PBRT") under ERISA § 502(a)(1)(B).
- If you are receiving this Notice, you have been identified by Anthem as someone who sought coverage from Anthem for PBRT for prostate cancer and Anthem denied coverage. Persons so identified by Anthem are "Settlement Class Members."
- Your legal rights are affected whether you act or don't act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	If you do nothing, you will not receive Settlement benefits. You will also give up your rights to be part of any other lawsuit against Anthem for the legal claims made in this case and released by the Settlement Agreement.
SUBMIT A CLAIM FORM	If you want to be eligible to receive Settlement benefits, you must submit a Claim Form. Claim Forms must be postmarked no later than **October 10, 2026**.
EXCLUDE YOURSELF FROM THE SETTLEMENT	If you exclude yourself or "Opt Out," you will not get Settlement benefits. This is the only option that allows you to be part of any other lawsuit against Anthem for the legal claims made in this case and released by the Settlement Agreement.
OBJECT TO THE SETTLEMENT	If you object, you must write to the Court with reasons why you do not agree with the Settlement.
GO TO THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. If the Court denies final approval, the Settlement will be void and the litigation will continue against Anthem.

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BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed Settlement that has been reached in a class action lawsuit and about all of your options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge William L. Campbell Jr. of the United States District Court for the Middle District of Tennessee is overseeing this class action. The case is known as *Taylor, et al. v. Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. and Anthem Insurance Companies, Inc.*, Case No. 3:23-cv-00541, and is referred to as the "Action." The people who filed the lawsuit are called Plaintiffs and the companies they sued, Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. and Anthem Insurance Companies, Inc. (together, "Anthem"), are called Defendants.

2. What is this lawsuit about?

Plaintiffs allege that, among other things, Anthem improperly denied benefits for proton beam radiation therapy ("PBRT") under ERISA § 502(a)(1)(B). Anthem has identified persons who received PBRT for prostate cancer but whose treatments were not covered by insurance (by Anthem or otherwise).

The lawsuit claims that Anthem denied health insurance coverage for PBRT for the treatment of prostate cancer to persons who: (1) were beneficiaries of an ERISA-regulated health plan; (2) had coverage under a health plan underwritten or administered by Anthem; (3) sought PBRT for treatment for prostate cancer; (4) were denied coverage based on a determination that PBRT was experimental, investigational, unproven, not sufficiently proven in effectiveness, or for (1) through (4), words to that effect; and (5) include persons whose pre-service requests for authorization were denied and persons whose post-service claims for reimbursement were denied. Anthem denies these claims and any wrongdoing.

3. What is a class action?

In a class action, one or more people called "Class Representatives" (in this Action, Todd J. Taylor and Thomas Lahowetz) sue on behalf of people who have similar claims. Together, all these people are called a Settlement Class or Settlement Class Members. One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Anthem. Instead, the Plaintiffs negotiated a Settlement with Anthem that allows them to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial. The Class Representatives and their attorneys think the Settlement is best for all Settlement Class Members.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

The Settlement includes the persons identified by Anthem in discovery in this Action who received PBRT for prostate cancer but whose treatments were not covered by insurance (by Anthem or otherwise).

6. Are there exceptions to being included in the Settlement?

Yes, the Settlement does not include (i) any judicial officer presiding over the Action and the members of his/her immediate family and judicial staff; (ii) Anthem, their employees, and their immediate family; (iii) Class Counsel, their employees, and their immediate family; and (iv) any person who validly Opts Out of the Settlement Class.

7. I am still not sure if I am included.

If you are still not sure whether you are included, all 888-266-6960, email admin@protonbeamradiationtherapylitigation.com, or visit www.protonbeamradiationtherapylitigation.com for more information.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

Anthem has agreed to pay a total of $3,625,000 to settle the Action. After deducting Court-approved attorneys' fees and costs, service awards, and the costs of administering the Settlement, the balance will be used to make payments to Settlement Class Members who submit valid Claim Forms.

9. What can I get from the Settlement?

If you are a Settlement Class Member, you may file a claim to receive payment. The Settlement Administrator shall determine the Settlement Payment based on the Settlement Class Member's total Qualifying Payment(s). Qualifying Payment(s) means the total amount of out-of-pocket payments made by a Settlement Class Member for PBRT for the treatment of prostate cancer (meaning treatments were not covered by insurance).

HOW TO GET SETTLEMENT BENEFITS

10. How do I get Settlement benefits?

You must file a Claim Form by October 10, 2026 to be eligible to receive a Settlement Payment. Settlement Class Members must also submit documentation, as set forth in the Claim Form, that demonstrates that the Settlement Class Member incurred a Qualifying Payment(s). This document must include the (1) provider's name, (2) provider's address, (3) date of service, (4) description of services provided, and (5) provider charges for which the Settlement Class Member paid out-of-pocket. Claim Forms may be printed from the website and mailed to the address on the form. Claim Forms must be postmarked no later than October 10, 2026.

11. When will I get my payment?

The Court will hold a Final Approval Hearing at 2:00 pm on August 19, 2026, to determine whether the Settlement Agreement should receive Final Approval by the Court. If the Court approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time, perhaps more than a year. Settlement benefits will be distributed after the Settlement is approved and becomes final.

12. What am I giving up to get Settlement benefits or stay in the Settlement?

Unless you exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Anthem and certain of Anthem's Released Parties for any claim related to the Action or released by the Settlement Agreement. You will be legally bound by all of the Court's orders, as well as the "Released Claims," below.

"Anthem's Released Parties" means Anthem, including its predecessor and successor entities, firms, affiliated companies, current and former parents and subsidiaries (and their parents and subsidiaries), and all of their respective shareholders, partners, joint venturers, directors, officers, employees, agents, administrators, executors, members, managers, trustees, representatives, attorneys, insurers, mutual assurance entities, assigns, and any third parties including any health-benefit plans, employer groups, or other Blue Cross and/or Blue Shield Plans for which Anthem processed health-benefit claims.

13. What are the Released Claims?

"Released Claims" mean any and all known and unknown claims for relief, causes of action, suits, rights of action, or demands, at law or in equity, whether representative, class, or individual in nature or sounding in contract, tort, equity, or any violation of law or regulation, including, without limitation, claims for injunctive or other equitable relief, damages, debts, indemnity, contribution, or for costs, expenses and attorneys' fees, based upon, arising from, or relating in any way to the factual predicates or legal claims that were brought in the Action, or could have been brought in the Action, relating in any way to the denial of health insurance coverage for PBRT for the treatment of prostate cancer to the persons identified by Anthem in discovery who: (1) were beneficiaries of an ERISA-regulated health plan; (2) had coverage under a health plan underwritten or to which Anthem's Release Parties provided administrative services; (3) sought coverage for PBRT for treatment of prostate cancer; and (4) were denied coverage based on a determination that PBRT was experimental, investigational, unproven, not sufficiently proven in effectiveness, not medically necessary, did not meet clinical policy, criteria or coverage, or for (1) through (4), words to that effect. More information about the Released Claims can be found in the Settlement Agreement and Release, available at www.protonbeamradiationtherapylitigation.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a written request to Opt Out from the Settlement to the Settlement Administrator. The request must:

1) Identify the case name and number,
2) Be signed by the person seeking to Opt Out from the Settlement Class,
3) Clearly express the person's desire to Opt Out from the Settlement Class, and
4) Include the person's name, address and telephone number and, if represented by counsel, counsel's name, address and telephone number.

Your opt out form must be postmarked no later than July 27, 2026 to:

Taylor, et al. v. Blue Cross Blue Shield Healthcare Plan of Georgia, Inc., et al.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

15. If I exclude myself, can I still get benefits from the Settlement?

No. If you exclude yourself from the Settlement, you will not receive any benefits because you will no longer be eligible for them.

16. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. If you stay in the Settlement (*i.e.*, do nothing or do not exclude yourself from the Settlement), you give up any right to separately sue Anthem or Anthem's Released Parties for the claims released by the Settlement Agreement and Release.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed Jordan Lewis of Jordan Lewis, P.A., Alyson Beridon of Herzfeld, Suetholz, Gastel, Leniski & Wall, PLLC, John Yanchunis of Morgan & Morgan, and Robert Sparks of Strauss Troy Co., LPA to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees of up to 33.33% of the $3,625,000 Settlement Amount and reimbursement of reasonable costs, as well as a $10,000 service award for each of the Class Representatives. If approved, these amounts will be deducted from the Settlement Amount before making payments to Settlement Class Members who submit valid Claim Forms.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must file a written objection with the Court, and mail copies to Class Counsel, Defense Counsel, and the Settlement Administrator. Your objection must be filed and postmarked no later than July 27, 2026.

Your objection must include:

1) the case name and number (*Taylor, et al. v. Blue Cross Blue Shield Healthcare Plan of Georgia, Inc., et al.*, No. 3:23-cv-00541);
2) your full name, mailing address, telephone number, and email address (if any);

3) the reasons why you object to the Settlement, including any documents supporting your objection;

4) the number of times you have objected to a class action settlement within the five years preceding the date of this objection, including:

   a. the caption of each case in which you have made an objection to, and

   b. a copy of any orders related to or ruling upon those objections as issued by the trial and appellate courts in each case;

5) the name, address, and telephone number of your attorney (if any) representing you in your objection, including any former or current counsel who may be entitled to compensation for any reason related to your objection;

6) the number of times your attorney or their law firm have objected to a class action settlement within the five years preceding the date of this objection, including:

   a. the caption of each case that your attorney or their law firm have made an objection to, and

   b. a copy of any orders related to or ruling upon those objections as issued by the trial and appellate courts in each case;

7) a statement indicating whether you or your attorney intend to appear at the Final Approval Hearing;

8) if you have retained an attorney and your attorney will appear at the Final Approval Hearing,

   a. the name, address, telephone number, and email address of your attorney, and

   b. a list of all persons who will be called to testify in support of your objection;

9) your signature (your attorney's signature is not sufficient).

Your objection must be filed with the Court and copies must be mailed to Class Counsel, Defense Counsel and the Settlement Administrator using the addresses below.

Court	**Class Counsel**	**Defense Counsel**	**Settlement Administrator**
Clerk of the Court Fred D. Thompson U.S. Courthouse and Federal Building 719 Church Street Suite 1300 Nashville, TN 37203	Jordan Lewis Jordan Lewis, P.A. 4473 N.E. 11th Avenue Fort Lauderdale, FL 33334 Alyson S. Beridon Herzfeld, Suetholz, Gastel, Leniski & Wall, PLLC 600 Vine Street, Suite 2720 Cincinnati, OH 45202 John Yanchunis Morgan & Morgan, Complex Litigation Group 201 N. Franklin Street, 7th Floor Tampa, FL 33602 Robert R. Sparks Strauss Troy Co., LPA 150 E. Fourth Street, 4th Floor Cincinnati, OH 45202	Robert Deegan Crowell & Moring LLP 300 N. LaSalle Drive Suite 2500 Chicago, IL 60654	*Taylor, et al. v. Blue Cross Blue Shield Healthcare Plan of Georgia, Inc., et al.* Settlement Administrator P.O. Box 301132 Los Angeles, CA 90030-1132

20. What is the difference between objecting to and excluding myself from the Settlement?

Objecting is telling the Court that you do not like something about the Settlement. Excluding yourself is telling the Court that you do not want to be part of the Class in this Settlement. If you exclude yourself from the Settlement, you have no basis to object because the Settlement no longer applies to you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at 2:00 pm on August 19, 2026, to determine whether the Settlement Agreement should receive Final Approval by the Court at the United States District Court for the Middle District of Tennessee, 719 Church Street, Suite 1300, Nashville, TN 37203. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed objections and may also listen to people who have asked to speak at the hearing (*see* Question 23). The Court will also decide whether to approve payments of attorneys' fees, costs, and service awards.

22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have, but you are welcome to come at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

23. May I speak at the Final Approval Hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 19 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

24. What happens if I do nothing?

If you do nothing, you will not receive any payment from this Settlement and you will be bound by the terms of the Settlement Agreement and Release if it is approved and becomes final. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or the Released Parties about the issues resolved by this Settlement and released by the Settlement Agreement.

GETTING MORE INFORMATION

25. How do I get more information?

More details are in the Settlement Agreement and Release, which is available at www.protonbeamradiationtherapylitigation.com. You may also call 888-266-6960, email admin@protonbeamradiationtherapylitigation.com, or write to the *Taylor, et al. v. Blue Cross Blue Shield Healthcare Plan of Georgia, Inc., et al.* Settlement Administrator, P.O. Box 301132, Los Angeles, CA 90030-1132.

Please do not call the Court or the Clerk of the Court for additional information.

They cannot answer any questions regarding the Settlement or the Action.