

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

<p>IN RE:</p> <p>Jeremiah F. Jones Teri Denice Mayers</p> <p style="text-align: center;">Debtors.</p>	<p>Case Nos. (respectively)</p> <p>18-06304-dd, Chapter 7 14-00864-dd, Chapter 7</p>
<p>Jeremiah Jones and Teri Denice Mayers, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>Lexington Health Services District, Inc. d/b/a Lexington Medical Center,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 20-80002-dd</p>

NOTICE OF CLASS ACTION SETTLEMENT

IF YOU DO NOTHING	If the Court approves the Settlement and you do nothing, you will receive a settlement payment. You will also release certain claims that you have against Lexington Medical Center. The full release and definition of the released parties are available on the Settlement Website, www.jonesclassaction.com .
IF YOU EXCLUDE YOURSELF FROM THE SETTLEMENT	You have the right to exclude yourself (“opt out”) from the Settlement by sending a written request addressed to Settlement Administrator at <i>Jones v. Lexington Medical Ctr.</i> , c/o Settlement Administrator, PO Box 23369, Jacksonville, FL 32241. You must state that you wish to be excluded from the Settlement and include your name and address. If you validly opt out, you will not receive any monetary payments from the Settlement and you will not have any right to object to the Settlement, but you will not be bound by the terms of the Settlement. The opt-out deadline is February 5, 2022.
OBJECT	You have the right to write to the Court to object to the Settlement if you believe it is unfair.

These rights and options - **and the deadlines to exercise them** - are explained in this Notice. The Court still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

WHAT IS THIS LAWSUIT ABOUT?

Plaintiffs Jeremiah Jones and Teri Denice Mayers, on behalf of themselves and all others similarly situated, filed a class action lawsuit in United States Bankruptcy Court for the District of South Carolina, alleging that Lexington Health Services District, Inc. d/b/a Lexington Medical Center (“LMC”) collected debts from class members in violation of bankruptcy stays and/or discharges.

LMC denies that it did anything wrong or that it violated any laws. The Court has never made a determination that LMC has done anything wrong. This notice should not be interpreted as an expression of the Court’s opinion on the merits of the lawsuit.

Within the Settlement, you are a member of the “Settlement Class.” The Settlement Class is defined to include: every person who declared bankruptcy within South Carolina whose discharged or stayed debt to LMC was collected by LMC through the Setoff Debt Collection Program or who made a payment to LMC on a discharged or stayed debt after receiving a Setoff Debt Collection Program notice in the tax years 2017, 2018, and 2019.

WHAT CAN I GET OUT OF THE SETTLEMENT?

A \$110,000 Settlement Fund will be used to make cash payments to the class members. All Settlement Class Members who do not opt out of the Settlement will receive a payment, should the Court grant final approval of the Settlement. Your individual payment amount will be determined based upon the amount you paid on your debt to LMC in comparison to the total payments made by all Settlement Class Members, as well as the final number of participating Settlement Class Members.

WHO ARE THE ATTORNEYS REPRESENTING THE CLASS AND HOW WILL THEY BE PAID?

The Court has approved lawyers to represent the Settlement Class (“Class Counsel”). If you prefer to hire your own attorney to represent you in this case, you may do so. The attorneys who have been appointed by the Court to represent the class are:

E. Michelle Drake
Joseph Hashmall
Berger Montague PC
1229 Tyler Street NE, Suite 205
Minneapolis, MN 55413
612-594-5999
emdrake@bm.net
jhashmall@bm.net

Dave Maxfield
David Maxfield, Attorney, LLC
P.O. Box 11865
Columbia, SC 29211
803-509-6800
dave@consumerlawsc.com

Subject to Court approval, Class Counsel will seek attorneys' fees and costs in an amount not to exceed \$170,000, separate from the payments to the Settlement Class. Class Counsel will also seek a service award in an amount not to exceed \$4,000 to be paid to each Plaintiff Jones and Mayers for their service in representing the Settlement Class. The settlement administration costs will be paid from the Settlement Fund.

WHAT RIGHTS AM I GIVING UP IN THIS SETTLEMENT?

You give up your right to sue or file a lawsuit seeking actual and punitive damages regarding LMC's collection of debts that were scheduled in bankruptcy proceedings and/or discharged by bankruptcy. Giving up your legal claims is called a release.

IF I CHOOSE TO DO SO, HOW DO I EXCLUDE MYSELF FROM THE SETTLEMENT?

The Court will exclude from the Class any individual who validly requests an exclusion. If you wish to be excluded, you must mail a written request for exclusion addressed to Settlement Administrator at *Jones v. Lexington Medical Ctr*, c/o Settlement Administrator, PO Box 23369, Jacksonville, FL 32241. Your request for exclusion must be in writing and postmarked on or before February 5, 2022. The request must indicate that you wish to opt out of the Settlement or otherwise do not want to participate in the Settlement. The request must include your name and address. If you exclude yourself, you are not eligible to receive a payment.

HOW DO I OBJECT TO THE SETTLEMENT?

You may object to all or part of the Settlement if you think it is not fair, reasonable and/or adequate. To object, you must file with the Court and send to the Settlement Administrator, a written explanation of the reasons you think that the Court should not approve the Settlement. Be sure to sign the letter and include your name, address, and the basis of your objection. The deadline to file an objection and to serve it on each of the lawyers is February 5, 2022.

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing on April 5, 2022, at 10:00 a.m. via public Zoom conference. The information to join is as follows: (1) Meeting ID: 160 544 7546; (2) Passcode: 0405; (3) Link: <https://www.zoomgov.com/j/1605447546?pwd=SjdjZVhHUEFaaUVFVFZVjYwUFVVSUT09>. At the Fairness Hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court will also hear objections to the Settlement, if any. We do not know how long the Court will take to make its decision. In addition, the hearing may be continued at any time by the Court without further notice to you.

You do not have to appear on the conference in order to receive a benefit. If the Court approves the Settlement, the Court's judgment will be binding on all class members who do not validly exclude themselves.

WHERE CAN I GET ADDITIONAL INFORMATION?

This notice is only a summary of the proposed settlement of this lawsuit. For more information, you may contact the Settlement Administrator at (844) 755-5801. Certain pleadings and documents

filed in Court, including the Settlement Agreement, may be reviewed, or copied in the Clerk's Office or by visiting the website www.jonesclassaction.com.