

Hawthorn Class Action
c/o Analytics Consulting LLC
P.O. Box 2002
Chanhassen, MN 55317-2002

ABC1234567890

Claim Number: 1111111



JOHN Q PARENT
123 MAIN ST
APT 1
ANYTOWN, ST 12345

RE: [NAME]

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
Horein et al. v. Michigan Department of Health and Human Services

If you, or an individual in your care, was a patient who was present at the Hawthorn Center on the morning of December 21, 2022, when an unannounced “active shooter drill” took place, you may be eligible for a payment from a class action settlement.

Please read this Notice carefully.

You have been sent this Notice of Proposed Class Action Settlement (the “Notice”) because [NAME] was identified as a patient who was present at the Hawthorn Center on the morning of December 21, 2022, when an unannounced “active shooter drill” took place.

[NAME] is an eligible Patient Class Member in the class action lawsuit captioned *Horein et al. v. Michigan Department of Health and Human Services*, COC No. 23-000063-MM, pending in the Michigan Court of Claims (“the Court”). The Court approved this Notice.

[NAME] is eligible to receive a payment of approximately \$55,000 from a proposed \$13,000,000 Class Action Settlement.

The easiest way to learn more and begin the process of claiming [NAME]’s award is to visit: www.HawthornClassAction.com or scan the QR Code below:



The enclosed Notice explains your legal rights **and the deadlines to exercise them.**

Questions? Visit www.HawthornClassAction.com, call 877-930-3083, or email info@HawthornClassAction.com

**NOTICE OF SETTLEMENT
HAWTHORN UNANNOUNCED “ACTIVE SHOOTER DRILL” CLASS ACTION
PATIENT PLAINTIFF CLASS**

Re: [NAME]

THE MICHIGAN COURT OF CLAIMS AUTHORIZED THIS NOTICE.

THIS IS NOT A SOLICITATION FROM A LAWYER. YOU ARE NOT BEING SUED.

THIS NOTICE AFFECTS YOUR LEGAL RIGHTS.

A proposed Settlement has been reached to resolve a class action lawsuit regarding an unannounced “active shooter drill” that took place at the Hawthorn Center on the morning of December 21, 2022.

If you, or the child in your care, are a Patient Plaintiff Class Member, there are benefits available to you from the proposed Settlement. **The easiest way to submit a claim is online at www.HawthornClassAction.com.** You can find the Settlement Agreement on the Settlement Website, and all capitalized terms in this Notice have the same meaning as set forth in the Settlement Agreement. You are receiving this Notice because you, or the minor child in your care, **NAME, DOB (year only), SSN last 4**, is eligible to receive a payment of approximately \$55,000 from a proposed \$13,000,000 Class Action Settlement.

Please read this notice carefully. Your legal rights will be affected, and you have a choice to make at this time.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT		DEADLINES
AUTOMATIC ELIGIBILITY	<p>The Hawthorn Patient is automatically eligible to submit a claim if their name is already listed as a patient who was present at the Hawthorn Center on the morning of December 21, 2022, when an unannounced “active shooter drill” took place. The Patient is automatically eligible if their name appears at the top of this Notice.</p> <p>If you or the individual in your care was a patient and present at the Hawthorn Center between 9 am and 11 am on December 21, 2022, and you believe that individual’s name was erroneously omitted from the list of automatically eligible Patient Plaintiff Class Members, you may register with the Special Master to seek eligibility. For more detailed information, see Question 7 and 8.</p>	March 25, 2024 , to register with the Special Master to confirm eligibility (if needed).
ACTIVATE YOUR ACCOUNT	Activate your Account at www.HawthornClassAction.com to expediting communications and easing the award process.	April 23, 2024
ELECT THE AWARD	<p>Class Counsel Michele Fuller, an attorney who specializes in the rights of children and individuals with disabilities, will provide education in several formats that explains the options available for payment of the Hawthorn Patient’s award, and any impact the \$55,000 may have on that individual’s eligibility for other important benefits like Social Security or Medicaid.</p> <p>The information provided will also explain how to access funds and how they can be used to increase the quality of life of the Class Member.</p>	June 28, 2024
OBJECT	You may object to the Settlement by writing to explain to the Court why you think the Settlement should not be approved. If you object, you will remain a Patient Plaintiff Class Member, and if the Settlement is approved, you will still be eligible for the benefits of the Settlement (if you submitted a timely and valid confirmation claim) and give up your rights to sue the State of Michigan on the claims described in the Settlement Agreement available at www.HawthornClassAction.com . For more detailed information, see Question 14 and 15.	September 27, 2024
DO NOTHING	If you do nothing, the Court will appoint a Guardian ad Litem—typically an attorney—to represent the interests of the Hawthorn Patient class member and make an election for the award on that individual’s behalf.	

The Court still will have to decide whether to approve the Settlement. Payments to Class Members will be made if the Court approves the Settlement, and after any possible appeals are resolved. Please be patient.

1. **The Hawthorn Unannounced Shooter Drill Lawsuit Settlement.** A settlement has been reached in a class action lawsuit that was filed in the Michigan Court of Claims in April of 2023 on behalf of the patients and employees present at the Hawthorn Center on the morning of December 21, 2022, alleging constitutional violations from an unannounced active intruder drill held that day. The lawsuit is entitled *Horein et al. v. Michigan Department of Health and Human Services*, COC No. 23-000063-MM. The defendant in the case is Michigan’s Department of Health and Human Services (“MDHHS”).

This notice explains the settlement of this lawsuit and your legal right to participate in the settlement or to exclude yourself from the settlement.

2. **Class Membership.** **NAME of Patient** is a member of the Patient Plaintiff Class and eligible to participate in the settlement of this case because **NAME of Patient** was a patient at the Hawthorn Center and present in the Hawthorn Center on December 21, 2022, between the hours of 9:00 am and 11:00 am.

Only Class Members may participate in this Settlement.

If you believe you, or the former Hawthorn patient in your care, were **erroneously excluded from the list of Patient Plaintiff Class** members provided by the State of Michigan Department of Health and Human Services, you have an opportunity to **register and gain eligibility**. To do so, you must visit www.HawthornClassAction.com, create an account login, and then upload evidence that proves you, or the individual in your care, were a patient at the Hawthorn Center on December 21, 2022, and was present at the Hawthorn Center between 9:00 am and 11:00 am that morning. **This registration must be completed by March 25, 2024**, and the Special Master for this class action settlement will advise you within 14 days whether you, or the individual in your care, have been determined to be an eligible member of the Patient Plaintiff Class.

You must be eligible—either automatically or as determined after registration—to be a Class Member. Only Class Members may participate in this Settlement. Class Counsel and the Claims Administrator can assist you in understanding your eligibility.

Hawthorn Active Shooter Drill Settlement Package: A package of important legal documents is available for your review and can be accessed through the Class Action Website, www.HawthornClassAction.com. This website will provide a secure way to review documents and communicate with the legal team about your settlement options. These documents are very important and will greatly assist you in making decisions about your legal rights and the best course of action for you. The Package is available to you even if you are later found to be ineligible to participate in the settlement. If you do not have access to email, the Claims Administrator or attorney Michele Fuller can be reached at the information provided below and will send you the documents via US mail.

3. **Background of Hawthorn Lawsuit.** On April 23, 2023, Plaintiffs D.H., by and through parents David and Kortni Horein, A.B., by and through parents and next friends Mollie and Brent Bonter, NaQuana Jones, Jason Smith, Jennifer Vance, Kai Mason, Annette Padula, and Chauncey Payne, Jr. (collectively, *Horein* Plaintiffs) filed this class action lawsuit on behalf of themselves and other patients and staff who were present at the Hawthorne Center, 18471 Haggerty Road, Northville, Michigan, on the morning of December 21, 2022, alleging constitutional violations from an active intruder drill held that day. On December 21, 2022, approximately 50 children were confined at the Hawthorn Center for inpatient psychiatric treatment. Approximately 110 employees, including childcare workers, psychologists and social workers, nurses, physicians, maintenance workers, housekeepers, office staff, teachers, and food preparers, were also present and on duty.

Mid-morning on December 21, 2022, the Hawthorn leadership team planned and ordered an “active shooter drill.” However, this drill was designed to be a “surprise” or unannounced drill, with no advanced warning to the employees or the children patients, or even to local law enforcement and first responders. Several announcements over the building loudspeakers said that there were armed intruders in the building, one Black man and one white man, firing automatic weapons. Nearly all staff and patients believed the truth of the announcement. The announcer sounded very distressed, which further convinced the individuals in the building that they were truly in a life-threatening situation. Children patients throughout the building were panicked and frightened—just like the adults charged to protect them.

Employees, hiding under their desks and barricading the doors to the areas where they hid with the children in their care, called 911, texted their last messages of love to family, and waited in extreme fear, praying that they would not die. Because law enforcement had no advanced warning about this “drill,” some 50 police and state troopers from multiple jurisdictions sped to the Hawthorn Center, armed themselves with their own automatic weapons, riot shields, and armor, and prepared to confront the mass shooters. People in the Hawthorn Center who were not sure if this was a drill or not, saw the huge police response assembling outside the building and believed that this was a genuine mass-shooter attack. A news report with footage of the incident can be found at <https://www.nbcnews.com/now/video/active-shooter-drill-sparks-fear-and-confusion-atmichigan-children-s-facility-166159429854>.

Meanwhile, two maintenance workers were directed to walk through the entire building playing the “role” of the active shooters, had no idea that the children and colleagues at the Hawthorn Center did not know this was “only a drill” and were unaware that the police had been called and had arrived in great force to neutralize the mass shooters—themselves. Upon leaving the building after the “drill,” these two men faced police officers in armor and pointing weapons at them. They were arrested and held in custody until their identities were confirmed and the facts of the “drill” had been sorted out.

This unannounced mass-shooter “drill” may have lasted less than an hour but it has scarred the patients and adults at the Hawthorn Center that morning. Plaintiffs representing the class describe severe post-traumatic stress conditions that have caused them to miss work, struggle in their family relationships, and suffer from numerous ailments related to severe anxiety and depression brought on by the horror they experienced.

The parties have negotiated to settle the lawsuits stemming from the December 21, 2022, active intruder drill. Through these negotiations, and consistent with the terms set forth in this Agreement, the Michigan Department of Health and Human Services (the Department) agreed to pay a sum total of thirteen million dollars (\$13,000,000.00) to resolve all claims that Plaintiffs and the putative class members could raise from the December 21, 2022 active intruder drill at the Hawthorn Center.

4. **The Settlement and Legal Proceedings.** The parties worked for months with a neutral mediator, William W. Jack, Jr., to arrive at the settlement of \$13,000,000. Class Representatives D.H., by and through parents David and Kortni Horein, A.B., by and through parents and next friends Mollie and Brent Bonter, NaQuana Jones, Jason Smith, Jennifer Vance, Kai Mason, Annette Padula, and Chauncey Payne, Jr., along with Brandon Woodruff, Hawk Kennedy and Counsel for the Class and for Mr. Kennedy formally agreed to the Settlement on January 31, 2024.

This settlement includes two funds:

- a. Patient Compensation Fund of \$2,888,888.89 to be used for the compensation of the 50 individuals who were patients of the Hawthorn Center and present at the Hawthorn Center on the morning of December 21, 2022, when the unannounced “active shooter drill” took place, and
- b. Staff Compensation Fund of \$5,777,777.78 to be used for the compensation of the 110 individuals who were employed at the Hawthorn Center and present at the Hawthorn Center on the morning of December 21, 2022, when the unannounced “active shooter drill” too place.

Additionally, a pool of \$4,333,333.33 has been reserved to pay for the administrative costs of the settlement of this class action and the attorney fees.

On February 16, 2024, Honorable James Redford of the Michigan Court of Claims certified this case as a Class Action Settlement and Preliminarily Approved the terms of the Settlement, appointed William W. Jack, Jr., as Special Master, appointed a Claims Administrator, approved the Plan of Allocation, and approved Class Counsel's request for attorney fees and administrative costs. The Court has established a timeline for final resolution of all claims. Documents concerning these legal proceedings are part of the Package and available at www.HawthornClassAction.com. The Settlement will resolve all claims of eligible Class Members. The Court will retain jurisdiction over the entire settlement process through final disbursements.

5. **The Claims Administrator.** The Court has approved Analytics Consulting LLC as the Class Action Claims Administrator. The Claims Administrator is responsible for providing information about the settlement to Class Members, managing legal documents related to the Settlement, and processing award payments from the Patient Compensation and Staff Compensation Funds established in the Plans of Allocation ("POA"). Contact information for Analytics Consulting LLC is Hawthorn Class Action, c/o Analytics Consulting LLC, P.O. Box 2002, Chanhassen, MN 55317-2002; Phone: 833-438-5028; Fax: 952-404-5750; Email: info@HawthornClassAction.com; Website: www.HawthornClassAction.com.
6. **Status of the Settlement Funds.** The Settlement Funds will have been paid in full by the State of Michigan by March 15, 2024, by electronic transfer to the Qualified Settlement Fund for this class action. In addition to being the Court approved Claims Administrator, the Court has appointed Analytics Consulting LLC as the Administrator of a Qualified Settlement Fund ("QSF"). The settlement funds will be held in trust by the QSF Administrator. The settlement funds have been deposited with Huntington National Bank. Huntington Bank will hold the funds in a secure interest-bearing account until disbursement is authorized by the Court. The net interest will become part of the settlement funds to be distributed to eligible Class Members receiving awards. It is anticipated that disbursements will not occur before December of 2024.
7. **For Automatically Eligible Class Members:**

Visit www.HawthornClassAction.com to learn about your rights and confirm your contact information to secure the rights of the Patient Plaintiff Class Member.

- a. Attorney Michele Fuller, a specialist in the rights of children and persons with disabilities, and members of her team will reach out to each Patient Plaintiff Class Member or their Next Friend, guardian, or legal representative, to review each individual's circumstances, discuss the settlement options for receiving the Class Member's award and assist each Class Member in selecting the option most appropriate for that individual. Once a selection is made, Ms. Fuller's team will assist the Plaintiff Class Member or their legal representative in completing the necessary forms.
- b. Three options will be available to choose from:
 - i. **Pooled Special Needs Trust (SNT)** is the mandatory selection for individuals who are currently on Supplemental Security Income (SSI) or will be applying for SSI as adults. This type of trust protects benefit (SSI and Medicaid) eligibility for anyone who meets the Social Security Administration's definition of disability. There is a non-profit trustee who understands the government benefit rules and will help make sure the funds enhance the life of the beneficiary while making sure the funds last as long as possible.
 - ii. **Pooled Settlement Preservation Trust (SPT)** option for all other individuals. This type of trust allows time for minors to grow up and gain maturity before being responsible for a large sum of money, and it protects them from creditors and predators when they become adults. The trust allows the trustee to make payments for anything the beneficiary

needs. The trustee can also pay for college tuition or other types of training, as well as transportation, or other things that enhance someone's life. Like the pooled special needs trust, there is a non-profit trustee to provide professional guidance and administration.

iii. Patient Plaintiff Class Members who are adults and are not Legally Incapacitated or Incompetent Individuals, have a third option to receive their award as a direct payment that is not held in a trust.

- c. All Patient Plaintiff Class Members must **confirm their award selection by June 28, 2024**.
- d. For each Patient Class Member who does not respond to this notice and does not make an election by June 28, 2024, the Court will appoint a Guardian ad Litem to represent that individual's interest and make an award election for them as deemed most appropriate by that Guardian ad Litem.

8. **For Individuals who are not Automatically Eligible:** If the patient was present at the Hawthorn Center between 9 am and 11 am on December 21, 2022, and you believe that patient's name was erroneously omitted from the list of automatically eligible Patient Plaintiff Class members, you may register that individual with the Special Master to seek eligibility.

Visit www.HawthornClassAction.com to register and seek eligibility to participate in this settlement, or follow these steps:

- a. **Register for Participation in the Settlement.** Visit the Hawthorn Class Action Website at www.HawthornClassAction.com, where you can review all the legal documents related to this Class Action. You will be able to **register and establish eligibility**. Once you have registered, you will be asked to confirm your contact information and provide other information necessary to evaluate the eligibility of the patient in your care to be a Patient Plaintiff Class Member.
- b. You will be required to **provide documentation that proves the individual patient was present at the Hawthorn Center during the "active shooter drill" on December 21, 2022**.

This step must be completed by March 25, 2024.

- c. The Special Master, William W. Jack, Jr., **will review all registrations and determine eligibility** within 14 days of receipt of a registration. The Special Master's determination of eligibility is final.
- d. **If an individual is determined to be an eligible Patient Plaintiff Class Member** through this registration process, the individual must then the process in item 7 above will apply.
- e. **If an automatically eligible Patient Plaintiff Class Member cannot be reached and has not opted out by April 23, 2024:** class counsel will have a Guardian ad Litem appointed for that individual to execute all documents on that individual's behalf, make the appropriate election for that individual, and exercise due diligence to locate that individual and inform them of their rights under this class action settlement.

9. **Class notifications and communications.** Eligible Patient Plaintiff Class Members, or their parents or guardians when applicable, will receive updates and communications regarding the Settlement process and award through the Claims Administrator and class counsel; therefore, it is important to provide accurate contact information through the website, www.HawthornClassAction.com.

10. **The Plan of Allocation ("POA").** Eligible Class Members will receive awards from the settlement funds in accordance with the Court approved POA. **All eligible Patient Plaintiff Class Members will receive an equal share of the Patient Compensation Fund**, less two payments of \$5,000 each to class representatives D.H. and A.B. Each Patient Class Member will receive individual counseling by class counsel to assist them in electing the award format most appropriate to their needs.

Attorney Michele Fuller and her staff will provide counsel and represent all Patient Plaintiff Class Members who participate in this settlement to ensure that their rights are protected and they receive adequate information regarding the impact of their award election on their eligibility for any public benefits.

Class counsel will have a Guardian ad Litem appointed by the court for any and all Patient Plaintiff Class Members who do not have a parent or guardian available to represent their interests regarding this class action settlement. The funds for each Patient Plaintiff Class Member will be distributed within 50 days of the date on which the Court issues its Order providing Final Approval of this class action settlement.

The Plan of Allocation is available for your review at www.HawthornClassAction.com.

11. **Attorney Fees and Administrative Costs:** The Court has approved attorney fees and Administrative costs in the amount of \$4,333,333.33, which includes costs of fees for administration of the class action expected to exceed \$800,000 as well as the fees for the attorneys. The Court-awarded attorney fees and administrative costs will be held in the QSF and Class Counsel's attorney's fees will not be paid to Class Counsel until the Court has entered its order of final approval of the settlement. The Court order preliminarily approving the Pool for Administrative Costs and Attorney's Fees is part of the Package and available for your review at www.HawthornClassAction.com.
12. **Creation of Net Settlement Fund and Pools:** Approved attorney fees and administrative costs will be deducted from the Gross Settlement amount of \$13,000,000, creating two net settlement funds: the Staff Compensation Fund of \$5,777,777.78 and the Patient Compensation Fund of \$2,888,888.89. The Court has approved the amounts in the Staff Compensation Fund and the Patient Compensation Fund. Earned interest will be added to the Settlement Pools.
13. **Legal Rights of a Class Member:** If you meet the definition of a Class member you have certain legal rights including the right to exclude yourself from this Class Action (also known as Opting Out). You have the right to hire a lawyer at your own expense to intervene in the Class Action. You are entitled to receive contact information about the Class Representatives, Class Counsel, Counsel for the Agency and the Court:

Class Representatives:

Plaintiffs D.H., by and through parents David and Kortni Horein, A.B., by and through parents and next friends Mollie and Brent Bonter, NaQuana Jones, Jason Smith, Jennifer Vance, Kai Mason, Annette Padula, and Chauncey Payne, Jr. (collectively, *Horein* Plaintiffs) may be contacted through Class Counsel

Class Counsel:

Robin B. Wagner, Michael L. Pitt, Beth M. Rivers
Pitt McGehee Palmer Bonanni & Rivers PC
117 W. Fourth Street Suite 200
Royal Oak, MI 48067
Phone: 248.398.9800 Fax: 248.268.7996
Email: rwagner@pittlawpc.com, mpitt@pittlawpc.com; brivers@pittlawpc.com
Website: www.pittlawpc.com

Counsel for Patient Class Members only:

Michele P. Fuller (P53316)
Michigan Law Center, PLLC
Attorney for Plaintiffs
45200 Card Road
Suite 108
Macomb, MI 48044
586-803-8500
michele@milaw.center

Counsel for the Michigan Department of Health and Human Services:

Neil A. Giovanatti, Bryan W. Beach, Ticara D. Hendley

Michigan Department of Attorney General

P.O. Box 30758

Lansing, MI 48909

Phone: 517-335-7603

Email: giovanattin@michigan.gov, beachb@michigan.gov, hendleyt@michigan.gov

The Court:

Honorable James Redford

The State of Michigan Building

350 Ottawa N.W.

Grand Rapids, MI 49503

Phone: 517.373.0807

Email: CClerksOffice@courts.mi.gov

Horein et al. v. Michigan Department of Health and Human Services, COC No. 23-000063-MM

14. **Exclusion or Opt-Out Rights:** You may exclude yourself from this Class and Settlement by submitting a timely letter signed by you stating your wish to be excluded. Your right to exclude yourself from the Class and Settlement is often described as your “Opt Out” right. Your Opt Out letter should be addressed to Class Counsel and sent via US mail, hand delivered, overnight mail service, emailed, or submitted online at www.HawthornClassAction.com with an electronic signature and received no later than April 23, 2024. If sent by US mail, the envelope should clearly show it was deposited with the US Postal Service no later than April 23, 2024.
15. **Legal Consequences of Opting Out.** If you Opt Out/exclude yourself from the class action, you will not be able to participate in the Settlement. You should consult with an attorney of your choice before making the decision to exclude yourself from the Class and Settlement. Your ability to successfully bring your own lawsuit against the Agency is very limited and you should make an informed decision as to your best course of action. Do not contact the Court for legal advice. Do not send your Opt-Out letter to the Court.

Legal Consequence of Remaining in the Class. If you do not Opt Out of the Class and Settlement you will not be able to bring your own lawsuit for damages for harm caused by the “active shooter drill.” If you are eligible to be a class member and do not Opt Out, you will be bound by the Settlement. As a member of the Class, you will receive a set award for your injuries as described above. The final awards will be the only compensation you will receive because of the harm caused to you by the December 21, 2022, “active shooter drill.”

The Fairness Hearing and Your Right to Object to the Settlement. The Court has scheduled a Fairness hearing to take place October 4, 2024, at the State of Michigan Building Courtroom, 350 Ottawa NW, Grand Rapids, MI 49503, Phone: 517.373.0807, Email: CClerksOffice@courts.mi.gov.

At the Fairness Hearing, the court will review the entire Settlement and consider any timely Objections. Disbursements to claimants and payment of attorney fees will occur shortly after the Court has entered its order of final approval of the case.

If you do not Opt Out of the Class Action Settlement but disagree with the amount of the Settlement, the terms of the Settlement Agreement, the Plan of Allocation, or the award of attorney fees and administrative costs, you may file your Objection with the Court. If you Opt Out of the Class Action Settlement you may not file an Objection. The Court will review all timely objections at a Fairness Hearing. If you file a timely objection with the Court, you may be entitled to appear at the Fairness Hearing to address the Court regarding your objections. Class Counsel will not be permitted to represent you at the Fairness Hearing. You may hire an attorney at your own expense to present your objections to the Court.

Only timely written Objections will be considered by the Court. Your Objection letter should be addressed to Court using the Court's contact information listed above. Your Objection can be delivered to the Court via US mail, hand delivered, or by overnight mail service and received by the Court by September 27, 2024. If sent by US mail, the envelope should clearly show it was deposited with the US Postal Service no later than September 27, 2024. A copy of your Objection filed with the Court should be delivered to Class Counsel and Counsel for the MDHHS via US mail, hand-delivery, overnight mail service through the www.HawthornClassAction.com website. Late Objections will not be considered by the Court.

Your Objection letter must be dated, refer to the *Hawthorn* Class Action, contain your complete contact information, and must describe which part of the settlement you are objecting to. You must state the reasons why you disagree with the part of the settlement you are objecting to.

16. There are no known counterclaims regarding this lawsuit or notices of intent to serve such a claim.
17. **Timeline of Key Events.** The Court has approved the Timeline printed below. Please take careful note of these important dates. Please check the Class Action website regularly for changes in the Timeline or to receive updates about the progress of the case.

Table of Important Dates

Filing of Motion for Preliminary Approval of Settlement before Judge Redford	January 31, 2024
Hearing on Motion for Preliminary Approval before Judge Redford	February 16, 2024
Preliminary Approval Order issued by Judge Redford	February 16, 2024
Distribution of Notice to Class Members and Posting of Notice on Class Website	February 23, 2024
Deadline for Registration to seek eligibility	March 25, 2024
Deadline for Special Master to determine eligibility	April 8, 2024
Deadline to Opt Out	April 23, 2024
Next Friends to be Appointed for Patient Plaintiffs	By May 7, 2024
Deadline to Make Award Elections	June 28, 2024
Filing Date for Motion for Fairness Hearing and Final Approval	September 13, 2024
Filing Date for Objections to Settlement	September 27, 2024
Fairness Hearing to hear objections and approve settlement before Judge Redford Address: State of Michigan Building 350 Ottawa N.W. Grand Rapids, MI 49503 Phone: 517.373.0807 Email: CCLerksOffice@courts.mi.gov	October 4, 2024
Order of Final Approval by Judge Redford ¹	October 4, 2024
Effective Date of Order ¹ (assuming no appeal of Final Approval Order)	November 26, 2024
Distribution of Awards to Patient Plaintiff Class Members ¹	December 6, 2024

¹ Assuming the Court issues Final Approval.