

Hawthorn Class Action
c/o Analytics Consulting LLC
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Chanhassen, MN 55317-2002

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

If you were an Employee or Staff Member 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 you were identified as an Employee or Staff Member 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 a Staff Plaintiff Class Member in the class action lawsuit *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.

Eligible members of the Staff Plaintiff Class under the Settlement Agreement may receive awards from a Compensation Fund for the trauma and emotional distress they suffered as a result of the December 21, 2022, unannounced “active shooter drill.” Each eligible member of the Staff Plaintiff Class who completes the confirmation forms and releases will receive a payment of at least \$5,000.

The easiest way to learn more and participate in this class action is to visit the website: www.HawthornClassAction.com or by scanning 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
STAFF PLAINTIFF CLASS**

To: [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 are a Staff 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 are eligible to receive a payment of at least \$5,000 from a proposed \$13,000,000 Class Action Settlement. Additional payments are possible based upon the results of a trauma assessment. **Please read this notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

The easiest way to learn more and participate in this settlement is to visit the website:

www.HawthornClassAction.com or by scanning the QR Code below:



**Questions? Visit <http://www.hawthornclassaction.com>, call 877-930-3083,
or email info@HawthornClassAction.com**

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.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT		DEADLINES
AUTOMATIC ELIGIBILITY	<p>You are automatically eligible if your name is already listed as an employee or staff member who was present at the Hawthorn Center on the morning of December 21, 2022, when an unannounced “active shooter drill” took place. You are automatically eligible if your name appears at the top of this Notice.</p> <p>If you were present at the Hawthorn Center between 9 am and 11 am on December 21, 2022, and believe your name was erroneously omitted from the list of automatically eligible staff members, you may register with the Special Master to seek eligibility. For more detailed information, see Question 8 and 9.</p>	March 25, 2024 , to register with the Special Master to confirm eligibility (if needed).
OPT OUT	You can exclude yourself from the Settlement by informing the Settlement Administrator that you want to “opt-out” of the Settlement. If the Settlement becomes final, this is the only option that allows you to retain your rights to separately sue the State of Michigan. If you opt-out, you may not submit a Confirmation Form for benefits under the Settlement. For more detailed information, see Paragraphs 16 and 17, below.	April 23, 2024
ACTIVATE YOUR ACCOUNT	Activate your Class Member account at www.HawthornClassAction.com to expedite communications and ease the process of claiming your award.	April 23, 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 Staff 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 Paragraphs 16 and 17, below	September 27, 2024
DO NOTHING	If you do nothing, you will not be entitled to any benefits provided under the Settlement and, if the Settlement becomes final, you will give up your right to sue the State of Michigan separately for the released claims on the claims described in the Settlement Agreement available at www.HawthornClassAction.com or to continue to pursue any such claims that you have already filed.	

IMPORTANT FACTS & INFORMATION

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.** You are a member of the Class and **automatically eligible** to participate in the settlement of this case if:
 - 1) You were present as a staff person employed at the Hawthorn Center on December 21, 2022, between the hours of 9:00 am and 11:00 am;
 - 2) The State of Michigan Department of Health and Human Services has listed you as an employee or staff person who was present at the Hawthorn Center on December 21, 2022, between the hours of 9:00 am and 11:00 am.; and
 - 3) You do not exclude yourself from the Settlement.

If you believe you were **erroneously excluded from the list of Staff 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 were a staff person employed at the Hawthorn Center on December 21, 2022, and were 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 have been determined to be an eligible member of the Staff 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.

3. **Hawthorn Active Shooter Drill Class Confirmation and Releases:** A package of important legal documents is available for your review and can be downloaded or printed at 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. If you are unable to access the documents online, the Claims Administrator will deliver to you hard copies of the documents via US mail or via email attachment. The Claims Administrator’s contact information can be found below.
4. **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, including to compensate eligible staff members under the Worker’s Disability Compensation Act, MCL 418.101, *et seq.*, for workplace injuries.

5. **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 and Hawk Kennedy, and the attorneys 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” took 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.

6. **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: <mailto:info@HawthornClassAction.com>; Website: www.HawthornClassAction.com
7. **Status of the Settlement Funds.** The Settlement Funds will have been paid in full by the State of Michigan by March 15, 2024, through a transfer to the Qualified Settlement Fund. 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 the third quarter of 2024.
8. **For Automatically Eligible Class Members:**

Visit www.HawthornClassAction.com to learn about your rights, activate your account and receive additional information about the settlement. Or follow these steps:

- a. Visit the Hawthorn Class Action Website at www.HawthornClassAction.com, where you can review **all the legal documents** related to this Class Action and activate your account. You will be asked to confirm your contact information and provide other information necessary to facilitate your participation in this settlement.
- b. **Complete an optional confidential trauma assessment, also known as a forensic psychology assessment**, that will be used to award you a larger share of the Staff Compensation Fund based on the traumatic impact that the “active shooter drill” of December 21, 2022, had on you.

You must complete the trauma assessment by June 12, 2024.

This trauma assessment is performed through an online questionnaire that involves 132 short questions and 5 long-form questions related to your mental health and your experience of traumatic symptoms due to the December 21, 2022, incident. This assessment is being conducted by a team of experts in psychological trauma from Boston College who have significant experience diagnosing trauma and its related conditions.

The assessment is online and will take approximately 1.5 hours (one hour and thirty minutes) to complete. Its results will be reviewed and tabulated by the Boston College team of experts. The Boston College team will assign a point value, between 1 and 100, with points being awarded to each individual proportionally to the traumatic impact on that person. This Boston College Trauma Assessment Team shall provide its point determinations to the Special Master, William W. Jack, Jr.. Mr. Jack is an experienced and highly regarded neutral attorney appointed by the court. He will review the results of the Trauma Assessment Team's assignments of points and then allocate the Staff Compensation Funds proportionately to each individual based on the points assigned to each individual by the Forensic Psychology team. The Special Master will compile an initial list of allocation awards based on the Trauma Assessment Team's determinations. Each Assessed Staff Plaintiff will then receive notice through the Claims Administration website of their preliminary allocation award, their forensic assessment score, and information on how to appeal the preliminary disbursement amount to the Special Master.

The entire process will be used **SOLELY for the purposes of the Class Action Settlement** and will only be shared with the Boston College Trauma Assessment team and the Special Master for the sole purpose of fairly allocating the settlement funds to the Staff Plaintiff Class members who seek compensation for the trauma they experienced. Each individual who participates in the Trauma Assessment will have the right to request a copy of their results. Otherwise, the answers and results will be strictly confidential.

The awards made through the Trauma Assessment process will be processed through the Michigan Worker's Disability Compensation Board as compensation for a workplace injury arising from the December 21, 2022, incident.

- c. Any Class Member who **does NOT complete the Trauma Assessment by June 12, 2024**, will receive a \$4,000 award processed through the Michigan Worker's Disability Compensation Board as compensation for a workplace injury arising from the December 21, 2022, incident.

9. **For Individuals who are not Automatically Eligible:** If you were present at the Hawthorn Center between 9 am and 11 am on December 21, 2022, and believe your name was erroneously omitted from the list of automatically eligible staff members, you may register 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 your eligibility to be a Staff Class Member.
- b. You will be required to **provide documentation** such as timecard records **that prove you were 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 Staff Plaintiff Class Member** through this registration process, the individual must then **proceed to item 8 above** and complete all those steps.

10. **Class notifications and communications.** If you are an eligible Staff Plaintiff Class Member, you will receive updates and communications regarding the Settlement process and your award through the Claims Administrator; therefore, it is important to provide accurate contact information through the website, www.HawthornClassAction.com.
11. **Appeals and Supplements to the Award.** Once you are notified of the Special Master’s determination of your award amount, you will have a meaningful opportunity to dispute the award and to seek a supplement to the award based on your trauma and injuries arising from the December 21, 2022, “active shooter drill.” You may submit evidence of out-of-pocket expense related to your trauma and injuries with your appeal.
12. **The Plan of Allocation (“POA”).** Eligible Class Members will receive awards from the settlement funds in accordance with the Court approved POA. **All eligible Staff Plaintiff Class Members will receive a check for \$1,000.**

The remainder of the Staff Compensation Fund will be distributed to the Staff Plaintiff Class Members as follows:

- 1) Class Members who have **Completed the Trauma Assessment by June 12, 2024** (see number 8.c, above) will receive a monetary award based on the points each individual was assigned for the trauma they experienced. This award will be distributed through worker’s compensation redemption process to settle each individual’s claims of workplace injury.
- 2) Class Members who do **NOT complete the Trauma Assessment by June 12, 2024** (see number 8.c, above) will receive a \$4,000 award, and this award will be distributed through worker’s compensation redemption process to settle each individual’s claims of workplace injury.

All Staff Plaintiff Class will be **provided at no cost with an attorney** to represent them with the worker’s compensation redemption process.

Each Eligible Class Member who does not Opt Out will receive at least \$5,000: \$1,000 for the release of claims and a \$4,000 worker’s compensation redemption for workplace injuries. Eligible Class Members who participate in the Trauma Assessment process may receive a far larger reward, depending on their individual experience of trauma and the number of individuals who participate in the Trauma Assessment process.

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

13. **Attorney Fees and Administrative Costs:** The Court has approved attorney fees in the amount of \$4,333,333.33, which is 1/3 of the Gross Settlement Fund. This includes over \$600,000 in costs and fees to administer the settlement and the remainder is fees to the Class Counsel. The Court awarded attorney fees and administrative costs will be held in the QSF and 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.
14. **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.
15. **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

16. **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.
17. **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 be able to receive a set award for your injuries and to participate in a Trauma Assessment to receive more substantial compensation from the Staff Compensation Fund. 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.”

18. **The Fairness Hearing and Your Right to Object to the Settlement.** The Court has scheduled a Fairness hearing to take place on Friday, October 4, 2024, at the State of Michigan Building, 350 Ottawa N.W., 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 and 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 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 portal. 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.

19. There are no known counterclaims regarding this lawsuit or notices of intent to serve such a claim.
20. **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	By 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
Deadline to Complete Trauma Assessment Questionnaires online	June 12, 2024
Date by which Assessed Staff Plaintiffs will receive notice of their preliminary allocation award	July 26, 2024
Date by which Assessed Staff Plaintiffs must appeal their preliminary allocation award	August 9, 2024
Date by which Assessed Staff Plaintiffs will receive notice of their Final allocation award	September 6, 2024
Deadline to complete documents for Worker's Compensation claims process	September 20, 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 (assuming no appeal of Final Approval Order) ¹	November 26, 2024
Issuance of \$1,000 to each class member ¹	By December 6, 2024
Worker's Compensation Redemptions and Payments ¹	January 17, 2025

¹ Assuming the Court issues Final Approval.