

June 4, 2010

**United HealthGroup UCR Settlement**  
**(Deadline to submit Claim Forms is October 5, 2010)**

Have you:

- (1) Provided covered out-of-network services or supplies between March 15, 1994 and November 18, 2009 (the “Class Period”) to patients who were covered by a health plan insured or administered by United HealthCare, Oxford Health Plans, Metropolitan Life Insurance Company, American Airlines, or any of those companies’ subsidiaries or affiliates (“Defendants”); AND
- (2) Billed one of the defendants for these services or supplies pursuant to an assignment? (under the UCR Settlement you are deemed to have billed pursuant to an assignment if you received payment directly from a Defendant for out-of-network services or if you completed box 13 in the HCFA/CMS 1500 Form or indicated yes in the benefits indicator on an electronic health claim form).

If yes, you are eligible to file a claim to recover a proportionate share of the \$350 million Settlement Fund.

Have you received the Notice of Proposed Settlement and Class Action Settlement?

The Settlement Claims Administrator is required to send mailed Settlement Notice and Claim Forms to all members of the Settlement Class for whom an address can be identified through reasonable effort.

The Settlement Claim Administrator is Berdon Claims Administration, LLC.

Have you submitted your Claims Information Request Authorization Form and returned it to the Settlement Claims Administrator?

In order to help you to complete your Claim Form, you may request the Settlement Claim Administrator to send you certain information furnished by Defendants regarding the Covered Out-Of-Network Services or Supplies that you provided January 1, 2002 through May 28, 2010. However, you must authorize the Settlement Claims Administrator to send you this information. You must complete and sign the authorization form on the bottom of page 15. The “Notice Number” requested on the form can be found under the return address on the Notice mailed to you by the Settlement Claims Administrator. If you did not receive a mailed Notice from the Settlement Claims Administrator, enter “Not Available”.

It is recommended that you send the Claims Information Request Authorization Form to the Settlement Claims Administrator as soon as possible. You can return the completed form by mail, fax or email to:

United HealthCare Class Action Litigation  
c/o Berdon Claims Administrator, LLC  
P.O. Box 15000  
Jericho, New York 11853-0001  
Toll Free#: 1-800-443-1073  
Facsimile: (516) 222-0271  
Website: [www.berdonclaims.com](http://www.berdonclaims.com)  
Email: [unitedhealthcare@berdonclaimslc.com](mailto:unitedhealthcare@berdonclaimslc.com)

#### About the Litigation:

MSSNY, the AMA and other parties filed a class action lawsuit against Defendants and alleged that Defendants provided insufficient reimbursement amounts for Covered Out-of-Network Services or Supplies including by:

- using a flawed database (the “Ingenix Databases) in determining reimbursement for Covered Out-Of-Network health benefits;
- using the out-of-network policies to reduce reimbursement amounts improperly for covered out-of-network health benefits; and
- inadequately disclosing the use of the Ingenix Databases and their out-of-network reimbursement policies.

#### There are Two Settlement Agreements:

1) The Cash Settlement - The Settlement establishes a Cash Settlement Fund in the amount of \$350 million plus accrued interest. If the Settlement Agreement is finally approved by the Court, members of the Settlement Class who submit a timely Claim Form will be entitled to payments from the Cash Settlement Fund.

2) Business Practice Initiatives – As part of the Settlement Agreement, and consistent with the terms of the separate “Assurance of Discontinuance” entered into with the New York State Attorney General, Defendants have agreed to certain commitments regarding their reimbursement practices and procedures for out-of-network healthcare benefits. United HealthGroup and its affiliates have agreed that they (a) will stop using the Ingenix Database that MSSNY and AMA allege are flawed, and, in their place, will use a New Database independently established and operated by a consortium of New York State university-level schools of public health led by Syracuse University; and (b) will contribute \$50 million towards the funding and implementation of the New Database (in addition to the \$350 million payment to the Cash Settlement Fund). The New York State Attorney General has entered into similar “Assurance of Discontinuance” agreements with the largest health insurers in the state, resulting in total contribution of nearly \$100 million to support the New Data Base.

IMPORTANT DATES:

The United States District Court in New York has scheduled a Fund Settlement Hearing for September 13, 2010.

The Settlement Claim Form must be Completed, Signed and Submitted by First Class Mail, Postmarked No later than October 5, 2010.

How Do I Get More Information?

Go to the website of Berdon Claims Administration, LLC [www.berdonclaims.com](http://www.berdonclaims.com). The Notice and Claim Form, and other documents including frequently asked questions are available at this website.

Also, go to:

MSSNY's website: [www.mssny.org](http://www.mssny.org)

AMA website: [www.ama-assn.org/go/ucrsettlement](http://www.ama-assn.org/go/ucrsettlement)

Settlement Lead Counsel website: [www.unitedUCRsettlement.com](http://www.unitedUCRsettlement.com)