

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

If you are or were a Customer Service Representative employed by Health Net within the last four years, please read this notice. A class action lawsuit may affect your legal rights.

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

- Customer Service Representatives have sued Health Net, Inc. and its subsidiaries (collectively referred to herein as “Health Net”) claiming that Health Net failed to pay all of the wages owed to them. Health Net denies that it has improperly paid any current or former employees, and denies that any current or former employees are entitled to any additional compensation or other relief.
- The Court has certified two classes of Customer Service Representatives:
 - **The Federal Law Class:** An “opt-in” class for unpaid overtime under the federal Fair Labor Standards Act (“FLSA”) defined as “all customer service representatives who worked in Health Net’s call centers nationwide within the last three years.”
 - **The State Law Class:** An “opt-out” class under California state law for failure to pay straight-time wages, failure to pay overtime wages, failure to pay all compensation due and owing at termination, failure to provide accurate wage statements, and unfair competition, defined as “all current and former customer service representatives who worked at Health Net’s California call centers within the last four years.”
- The Court has not decided who is right and who is wrong. Your legal rights may be affected and you are now entitled to make a choice whether to participate in one or both of the classes.
- Please note you have a right to participate in both the federal and the state law class actions, or you can choose not to participate in one or either.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

<p align="center">IF YOU WANT TO PARTICIPATE IN THE FEDERAL LAW CLASS</p>	<p>If you want to be included in the Federal Law Class, then you must complete the “Consent to Join” form at the end of this Notice and return it by October 24, 2011.</p> <p>If you choose to be included in this class, you keep the possibility of getting money or benefits that may come from a trial or a settlement of the federal law claims, and you give up any rights to separately sue Health Net about the same legal claims in this lawsuit.</p> <p>You will only be included in the Federal Law Class if you timely submit a Consent to Join form. If you do not timely submit a Consent to Join form, you will not be included in the Federal Law Class.</p>
<p align="center">IF YOU WANT TO PARTICIPATE IN THE STATE LAW CLASS</p>	<p>If you want to participate in the California State Law Class, then you do not need to do anything. You will automatically be included in the State Law Class unless you timely file an “Opt-Out” form.</p> <p>If you choose to be included in the California State Law Class, you keep the possibility of getting money or benefits that may come from a trial or a settlement of the California state law claims, and you give up any rights to separately sue Health Net about the same legal claims in this lawsuit under California state law.</p> <p>If you do not want to participate or be included in the California State Law Class, then you must complete the “Opt-Out” form at the end of this Notice and return it by October 24, 2011.</p> <p>By mailing in the “Opt-Out” form, you give up the possibility of getting money or benefits that may come from a trial or settlement of the California state law claims. You keep any rights to sue Health Net separately about the same legal claims in this lawsuit, but the limitations period on your claim continues to run.</p>

<p>IF YOU WANT TO PARTICIPATE IN BOTH CLASSES</p>	<p>In order to be included in the Federal Law Class, you must complete the “Consent to Join” form at the end of this Notice and return it by October 24, 2011. This is the only form you must submit to be included in both classes. To participate in the California State Law Class, you do not need to do anything. You will automatically be included in the State Law Class unless you timely file an “Opt-Out” form.</p> <p>If you choose to be included in both classes, you keep the possibility of getting money or benefits that may come from a trial or a settlement of both the state and federal law claims, and you give up any rights to separately sue Health Net about the same legal claims in this lawsuit.</p>
<p>IF YOU DO NOT WANT TO PARTICIPATE IN THIS CASE AT ALL</p>	<p>If you do not want to participate in this case at all, then you must complete the “Opt-Out” form at the end of this Notice and return it by October 24, 2011, and do not submit a Consent to Join form.</p> <p>By mailing in the “Opt-Out” form and not submitting a Consent to Join form, you give up the possibility of getting money or benefits that may come from a trial or settlement of any of the claims in this lawsuit. You keep any rights to sue Health Net separately about the same legal claims in this lawsuit, but the limitations period on your claim continues to run.</p>

- Your options are explained in this notice. **The deadline for mailing in either the “Consent to Join” or “Opt-Out” form at the end of this Notice is October 24, 2011.**
- Depending on what you choose to do, you will be notified about how to ask for a share if money or benefits are obtained from Health Net either through a trial or settlement.

This notice contains information that affects your rights. Please read it carefully.

1. Why did I get this notice?

Health Net’s records show that you currently or previously worked for Health Net as a Customer Service Representative. This notice explains that the Court has allowed, or “certified” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial. A trial may be necessary to decide whether the claims being made against Health Net are correct. The Honorable Josephine Staton Tucker, a Judge in the United States District Court for the Central District of California is overseeing this lawsuit. The lawsuit is known as *Eddings v. Health Net, Inc., et al.*, Case No. CV 10-1744-JST (MANx).

2. What is this lawsuit about?

This lawsuit is about whether Health Net failed to properly pay its Customer Service Representatives for the time that they worked.

3. What is a class action and who is involved?

In a class action lawsuit, one or more persons sue on behalf of other people who have similar claims. All employees who decide to participate in the case are a “Class” or “Class Members.” The Customer Service Representative who sued – and all of the Class Members like her – are called Plaintiffs. Health Net and its subsidiaries are called Defendants. One court resolves the issues for everyone.

4. What is Health Net’s position?

Health Net denies that it has improperly paid any current or former employees, and denies that any current or former employees are entitled to any additional compensation or other relief.

5. Has the Court decided who is right?

The Court has not decided whether Health Net or the Plaintiffs are correct. By establishing the Class and issuing the Notice, the Court is not suggesting that the Plaintiffs will win or lose the case.

6. What are the Plaintiffs asking for?

Plaintiffs are seeking to recover unpaid wages and overtime. Plaintiffs also seek monetary penalties under California law for failure to pay all compensation due and owing at termination, and failure to provide accurate wage statements. Plaintiffs also seek restitution of the amounts owed under California's unfair competition laws. Plaintiffs also seek recovery of costs and attorneys' fees.

7. Can I join this lawsuit?

If you were employed by Health Net as a Customer Service Representative in the last four years, you are eligible to join this lawsuit. Both current and former employees are eligible to join.

8. I'm still not sure if I am included.

If you are still not sure whether you are included or what you need to do, you can get free help by calling or writing the lawyers in this case, at the phone number or address listed below.

9. What happens if I choose not to participate in this lawsuit?

If you choose not to participate in this lawsuit, you will not be affected by any ruling, judgment or settlement rendered in this case, whether favorable or unfavorable. You will not be entitled to share any amounts recovered by Plaintiffs as part of this lawsuit. You also will be free to independently retain your own counsel and file your own individual lawsuit, subject to any defenses that might be asserted.

You should be aware that FLSA claims are typically limited to a two or three-year statute of limitations, and delay in joining this action, or proceeding separately, may result in some or all of your federal claims expiring as a matter of law. You should also be aware that the California claims are limited to a four-year statute of limitations, and declining to participate in this lawsuit by opting out, or proceeding separately, may result in some or all of your claims expiring as a matter of law.

10. What happens if I participate in the lawsuit?

If you choose to fully participate in this lawsuit, you will be bound by any ruling, settlement or judgment, whether favorable or unfavorable. You will also be bound by, and will share in, any settlement that may be reached on behalf of the class. By joining this lawsuit, you designate the named Plaintiffs, to the fullest extent possible, to make decisions on your behalf concerning the case, the method and manner of conducting the case, the entering of an agreement with Plaintiffs' counsel regarding payment of attorneys' fees and court costs, the approval of settlements, and all other matters pertaining to this lawsuit. These decisions and agreements made and entered into will be binding on you if you join the lawsuit. While this suit is pending, you may be required to provide information, appear for a deposition or at trial, or otherwise participate in the action. You are also permitted to attend any hearings in this matter.

11. Where do I send the forms at the end of this Notice and what is the deadline?

If you choose to participate **only in the federal FLSA class** in this lawsuit, **you must sign and promptly return both the "Consent to Join Form" and the "Opt-Out Form."** An addressed and postage paid envelope is enclosed for your convenience.

If you choose to participate in **both the federal FLSA class and the state law class**, you must sign and promptly return the "Consent to Join Form", but **do not return** the Opt-Out Form.

If you choose to participate only in the state law class in this lawsuit, **you do not need to send in either Form.** Should the enclosed envelope be lost or misplaced, the form you choose must be sent to:

**Health Net Litigation
Stueve Siegel Hanson LLP
460 Nichols Road, Suite 200
Kansas City, Missouri 64112**

The signed Consent to Join form must be postmarked by October 24, 2011. **If your signed Consent to Join Form is not postmarked by October 24, 2011, you will not participate in any FLSA recovery obtained against Health Net in this lawsuit.**

12. Do I have a lawyer in this case?

If you choose to join this lawsuit you will be represented by George A. Hanson, Eric L. Dirks, and Jason M. Lindner of Stueve Siegel Hanson LLP.

13. Should I get my own lawyer?

If you choose to be a member of either or both of the classes, you do not need to hire your own lawyer for those claims because Plaintiffs' counsel will be working on your behalf. If you want your own lawyer, you may have to pay that lawyer and will have to file your own separate lawsuit.

14. How will the lawyers be paid?

The named Plaintiffs have entered into a contingency fee agreement with Plaintiffs' counsel, which means that if you do not win, there will be no attorneys' fees or costs chargeable to you. Under the fee agreement, in the event there is a recovery, Plaintiffs' counsel will receive a percentage of any settlement obtained or money judgment entered in favor of all members of the class. The Court may also be asked to determine the amount of fees. The fees may be part of a settlement obtained or money judgment entered in favor of Plaintiffs, or may be ordered by the Court to be separately paid by Health Net, or may be a combination of the two.

15. How will I get paid?

If you choose to become a member of a class, and if the Plaintiffs obtain money or benefits as a result of the trial or a settlement, you will be notified of your entitlement to recovery and how to obtain it.

16. Are there more details available?

Yes. If you have any questions or require additional information, please contact any of the following individuals:

George A. Hanson, Attorney
Eric L. Dirks, Attorney
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866-714-0875
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