

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

If you are or were a Customer Service Representative employed by Health Net during the last three 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 conditionally certified a collective action for unpaid overtime under the federal Fair Labor Standards Act (“FLSA”). The class of plaintiffs is defined as “all customer service representatives who worked in Health Net’s call centers nationwide within the last three years.”
- An additional class has been certified under California state law for “all current and former customer service representatives who worked at Health Net’s California call centers within the last four years.” **You are receiving this nationwide-only notice because Health Net’s records indicate that you worked in one of its call centers, but not in California.** If this is in error, and you worked in a Health Net’s call center in California, please contact one of the attorneys listed below and we will provide you with a notice related to the California class action.
- 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.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

ASK TO BE INCLUDED	<p>If you want to be included in the 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 the class, you keep the possibility of getting money or benefits that may come from a trial or a settlement, 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 class if you timely submit a Consent to Join form. If you do not submit a Consent to Join form, you will not be included in the class.</p>
DO NOTHING	<p>If you do nothing, you keep any rights you may have to sue Health Net separately about the same legal claims in this lawsuit, but the statute of limitations continues to run and your potential claims will not be included in the lawsuit maintained by the named Plaintiff(s).</p>

- Your options are explained in this notice. **The deadline for mailing in the “Consent to Join” at the end of this Notice is October 24, 2011.**
- If you timely join this class, you will be notified 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 "conditionally certified" a collective 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 collective action and who is involved?

In a collective action lawsuit, one or more people sue on behalf of other people who they believe have similar claims. All employees who decide to participate in the case are "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 who decides to join the case.

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 overtime. 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.

10. What happens if I fully 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 Plaintiff, and 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. How do I ask the Court to include me in the case?

If you choose to participate in the class, **you must sign and promptly return the “Consent to Join Form.”** An addressed and postage paid envelope is enclosed for your convenience.

Should the enclosed envelope be lost or misplaced, your form 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 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 the class, 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 Plaintiff has 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 the 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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