

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOES 1-14, on their own behalf and
on behalf of all others similarly situated,

Plaintiffs,

v.

NORTHSHORE UNIVERSITY
HEALTHSYSTEM,

Defendant.

Case No. 1:21-cv-05683

Judge John F. Kness

Mag. Judge Jeffrey I. Cummings

**AGREED JOINT SUPPLEMENT TO
MOTION FOR CERTIFICATION OF SETTLEMENT CLASS
AND PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs Jane Does 1-13 (“Plaintiffs”) and Defendant NorthShore University HealthSystem (“NorthShore”), by and through their respective undersigned counsel, hereby jointly provide for the Court’s review and approval the following additional documents related to the parties’ Settlement Agreement, which this Court preliminarily approved on August 5, 2022 (dkt. 113):

- 1) Proposed Notice Plan (attached as **Exhibit A**);
- 2) Proposed Notice of Class Action Settlement (attached as **Exhibit B**);
- 3) Proposed Settlement Claim Form (attached as **Exhibit C**); and
- 4) Proposed List of Settlement Deadlines (attached as **Exhibit D**).

The parties understand that the Court intends to “enter [a] separate preliminary approval order.” (Dkt. 113). The parties respectfully request that the Court’s forthcoming order include

approval of the items submitted herewith, and include the appropriate deadlines agreed upon by the parties (Exhibit D).

As the deadlines proposed by the parties anticipate the sending of the Notice and Claim Form to Settlement Class Members on **September 13, 2022**, the parties respectfully request the Court's preliminary approval order to be issued **prior to August 31, 2022**, if such is possible and convenient for the Court, to enable the parties and the Settlement Administrator to timely prepare the necessary documents and actions. The parties stand ready for any follow-up status conference or discussion that the Court deems necessary.

Dated: August 17, 2022

Respectfully submitted,

s/ Horatio G. Mihet

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***Attorneys for NorthShore University
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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2022, I caused a true and correct copy of the foregoing to be electronically filed with the Court. Service will be effectuated on all counsel of record via the Court's ECF/electronic notification system.

/s/ Horatio G. Mihet
Horatio G. Mihet

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Doe 1, et al. v. NorthShore University HealthSystem
No. 1:21-cv-05683

NOTICE PLAN

Counsel for Plaintiffs Jane Does 1 through 13 and Defendant NorthShore University HealthSystem (collectively, the “Parties”) have prepared for the Court’s review and approval the following Notice Plan.¹ The Plan outlines the process for the Notice to be sent to Class Members to inform them of the Settlement, its terms, Class Members’ rights, and the ability to opt-out, object, or participate in the Settlement.

1. Subject to the Court’s approval, Class Counsel has selected American Legal Claims Services, Inc., to serve as Settlement Administrator. The Settlement Administrator will perform the following tasks, among others:

- Distribute the Notice to Class Members;
- Receive and forward to Class Counsel and NorthShore any Objections or Opt-Out Statements from Class Members;
- Distribute and receive Claim Forms and related documents as well as communications to and from Class Members in a confidential manner;
- Process Monetary Awards, including tax reporting, as directed in the Settlement Agreement; and
- Distribute the settlement payments to Class Members as set forth in the Settlement Agreement.

2. On August 8, 2022, NorthShore filed the CAFA Notice, along with the accompanying materials, with the appropriate state and federal officials as required by 28 U.S.C. § 1715. NorthShore has confirmed in writing and provided to Class Counsel proof of service of the CAFA Notice to the appropriate federal and state officials.

¹ Capitalized terms have the same meaning as defined in the Parties’ Settlement Agreement (ECF 107-1).

3. By August 29, 2022 (30 days after execution of the Settlement Agreement), NorthShore will provide Class Counsel and the Settlement Administrator with the names and certain contact information and identifying information of all Settlement Class Members. This data will be maintained as strictly confidential and will not be shared with any other person or entity other than Class Counsel and Settlement Administrator.

4. By September 13, 2022 (within 15 days after NorthShore provides the above information), the Settlement Administrator will mail the Notice and Claim Form to each Class Member in the form agreed upon by the Parties' Counsel and approved by the Court.

5. By September 13, 2022, Class Counsel will publish a website at www.lc.org/northshore on which the Settlement Agreement, Notice, Claim Form, related Court Orders, and other documents and content will be available to Class Members. The content, language, and format of the website will be subject to approval by NorthShore and the Settlement Administrator. Class Counsel may supplement the notice efforts above with additional public announcements and press releases through Class Counsel's own public communication channels and networks.

6. The Parties have carefully crafted the Notice to ensure Class Members are fully apprised of their rights and obligations under the Settlement. The Notice will detail, among other items, the purpose of the Notice; the background of the lawsuit and an overview of the Class; a summary of the Settlement's terms; options for Class Members; what will happen if the Settlement is approved; how the settlement award will be calculated; potential tax consequences; information about Class Counsel and their forthcoming request for attorneys' fees; information about the final approval hearing; and important deadlines.

7. To provide the best notice practicable, before mailing the Notice and Claim Forms, the Settlement Administrator will run the list of all Class Members through the United States Postal Service's National Change of Address database ("NCOA"). If envelopes from the mailing of the Notice and Claim Form are returned with forwarding addresses, the Settlement Administrator will re-mail the Notice and Claim Form to the new address within five (5) business days.

8. The Settlement Administrator will also run the list of Class Member addresses through the United Postal Service's Coding Accuracy Support System (CASS) for standardization of addresses and better deliverability.

9. In the event that a Notice and Claim Form are returned to the Settlement Administrator by the United States Postal Service because the recipient's address is no longer valid (*i.e.*, the envelope is marked "Return to Sender"), then the Claims Administrator will perform an address search (or skip trace) through credit bureau reporting channels to attempt to ascertain the current address of the particular Class Member. If a new address is discovered, then the Claims Administrator will re-send the Notice and Claim Form within five (5) business days of receiving the newly ascertained address.

10. By October 13, 2022, the Settlement Administrator will re-send the Notice and Claim Form to each Class Member who has not yet returned a Claim Form, or filed an objection, or exercised an Opt-Out.

11. The Settlement Administrator may take further efforts to notify Class Members, such as by telephone or by emailing the Class Member a PDF copy of the Notice and Claim Form. The Settlement Administrator will provide to Class Counsel a list of the names of those Class Members who have not been located.

12. If the Court grants Final Approval, the Settlement Administrator will mail within sixty (60) days after Final Approval a Settlement Award in the form of a check to each Class Member who (a) did not opt-out; (b) validly and timely submitted their Claim Form; and (c) meets the criteria for one of the two allocation groups.

13. The Settlement Administrator will maintain a log of all its activities undertaken pursuant to this Notice Plan, including the dates of mailing the Notices of Preliminary and Final Approval of Class Action, the mailing and receipt of Claim Forms, returned mail, and other communications and attempted communications with Class Members. The Settlement Administrator will further confirm in writing the substance of its activities and completion of the

administration of the Settlement; timely respond to communications from the Parties or their respective counsel; and perform such other tasks as the Parties mutually agree or ordered by the Court.

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

NOTICE OF CLASS ACTION SETTLEMENT, PROPOSED SETTLEMENT AGREEMENT, AND FINAL APPROVAL HEARING

If you are a current or former NorthShore University HealthSystem Team Member who applied for, and was denied, a religious accommodation to NorthShore's Vaccine Policy requiring COVID-19 vaccination, a class action settlement will affect your rights.

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

On August 5, 2022, Judge John F. Kness of the U.S. District Court for the Northern District of Illinois granted Preliminary Approval of a proposed class action settlement in the lawsuit *Doe 1, et al. v. NorthShore University HealthSystem*, 1:21-cv-05683 (N.D. Ill.). The Court ordered this Notice to inform you of your rights and options under the Settlement. The proposed Settlement will provide a Settlement Fund of \$10,337,500.00 for a class of current and former NorthShore employees, contractors, physicians, staff, and volunteers (collectively "Team Members") to resolve disputed claims against NorthShore regarding alleged religious discrimination. The proposed Settlement will also provide certain Programmatic Relief whereby NorthShore will enhance its religious accommodation procedures to its vaccination requirements.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
Stay in the Lawsuit and Submit a Claim for a Monetary Award	If you like the settlement's terms, stay in the lawsuit. Submit a claim and seek money if the Court approves the Settlement. Give up certain rights to sue NorthShore. The Court still must decide whether to approve the Settlement. If you wish to participate in the Settlement, you must complete and submit a Claim Form by November 18, 2022 . If the Court approves the Settlement, and you submit a valid claim, then you will be mailed a settlement check.
Comment or Object	Write to the Court about your view of the Settlement or object if you don't think it's fair. You must object to the Settlement by November 18, 2022 .
Exclude Yourself (Opt Out)	Opt Out of the Settlement's monetary relief. Receive no money from the Settlement. If the Settlement becomes final, this is the only option that allows you to retain your rights to separately sue NorthShore for the claims resolved by the Settlement. You must Opt Out, or seek exclusion from, the Settlement by November 18, 2022 .
These options—and the deadlines to exercise them—are explained in this Notice.	

WHAT THIS NOTICE CONTAINS

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1. Purpose of this Notice

This Notice informs you about (i) this lawsuit; (ii) the Settlement and Settlement Class definition that the Court has preliminarily approved; and (iii) your legal rights and options in connection with the Settlement and a hearing to be held before the Court on **December 19, 2022**, to consider the fairness, reasonableness, and adequacy of the Settlement and related matters.

This Notice also describes the steps to be taken by those who wish to be excluded from the Class or object to the Settlement, and for those who remain in the Class, the steps necessary to seek a share of the Settlement Fund if the Court approves the Settlement.

2. Background of the Lawsuit

Plaintiffs Jane Does 1 through 13, current and former NorthShore Team Members, retained Class Counsel to represent them with their individual and potential Class-wide employment claims of religious discrimination against NorthShore. In October 2021, Plaintiffs filed a class action lawsuit alleging that NorthShore's vaccine policy, which requires COVID-19 vaccination (the "Vaccine Policy"), including NorthShore's procedures for reviewing and granting exemptions and/or accommodations to the vaccination requirement, was religiously discriminatory in violation of Illinois and federal law. Together, Plaintiffs Does 1 through 13 are called "Named Plaintiffs" because they brought the lawsuit seeking to represent a group (or "class") of similarly situated current and former NorthShore Team Members who sought a religious accommodation to NorthShore's Vaccine Policy. The Verified Class Action Complaint describes Plaintiffs' claims and can be found at www.lc.org/NorthShore. The lawsuit is known as *Doe 1, et al. v. NorthShore University HealthSystem*, 1:21-cv-05683 (N.D. Ill.).

NorthShore denied and continues to deny all the allegations and claims asserted in this lawsuit, including alleged liability under federal and state anti-discrimination laws, and it denies that the Named Plaintiffs or Class Members are entitled to any relief. The Court has not made, nor will it make, any determination on the merits of this matter, such as which party is right or wrong. By entering into the proposed Settlement, NorthShore does not admit any wrongdoing or liability. The Settlement resolves claims of religious discrimination in terms and conditions of employment, including claims brought, or that could have been brought, under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, et seq., as well as state anti-discrimination laws, including the Illinois Health Care Right of Conscience Act, 745 ILCS 70/1, et seq.

The Court has reviewed the Settlement and has preliminarily approved it as being fair, adequate, and reasonable. Before deciding whether to give the Settlement Final Approval, the Court wishes to inform the Class of the general terms of the Settlement and of the right of Class Members to comment on, object, or to Opt Out of (be excluded from participating in), the Settlement.

3. Class Definitions

You are a member of the Class and are affected by the Settlement if you fit within this definition:

All NorthShore Team Members who: (1) between July 1, 2021, and January 1, 2022, submitted to NorthShore a request for religious exemption and/or accommodation from its Vaccine Policy requiring COVID-19 vaccination; (2) were denied a religious exemption and/or accommodation; and (3) either received a COVID-19 vaccine to avoid termination or were discharged or resigned based upon their religious declination of a COVID-19 vaccine.

If you received this Notice in a mailing addressed to you, then NorthShore's records show that you may be a Class Member, *i.e.*, that you may fit the definition above. If so, you have legal rights and options that you can exercise before the Court gives final approval to the Settlement.

4. Summary of Settlement Terms

NorthShore has agreed to create a Settlement Fund of \$10,337,500. The Settlement Fund will cover payments to Class Members, Service Awards to the Named Plaintiffs, Class Counsel's attorneys' fees and costs, and the costs of administering the Settlement Fund.

Along with establishing the Settlement Fund, NorthShore has agreed to take actions designed to enhance its religious accommodation policies for its System Vaccine Program, which includes a COVID-19 vaccination requirement. For example, Team Members who were terminated or resigned following the denial of religious accommodation will be eligible for rehire if they apply within 90 days after the Settlement is approved, and NorthShore will review and grant future religious accommodation requests in accordance with recent federal rules and court decisions.

The Settlement Agreement that has been preliminarily approved by the Court contains many more details, and can be found at www.lc.org/NorthShore.

5. How to Proceed: Your Options

Option A: Stay in the Lawsuit and Submit a Claim Form

The Court still must decide whether to grant Final Approval of the Settlement. If you wish to take part in the Settlement, you must complete and submit a Claim Form, which must be mailed to the Settlement Administrator and postmarked on or before **November 18, 2022**. Note: you may comment or object to the Settlement and still submit a Claim Form. After receiving your Claim Form, the Settlement Administrator will review your claim to ensure that it is valid and timely. Submitting a Claim Form by the deadline set by the Court is the only way to get money from the Settlement. **You must timely submit a Claim Form in order to receive money from the Settlement.** If the Court approves the Settlement, then you will receive a check from the Settlement Fund within 60 days after final approval.

In addition to your claim form being postmarked by November 18, 2022, to be eligible for a payment from the Settlement Fund, **your claim form must be actually received by the Settlement Administrator by November 28, 2022.** Neither the Settlement Administrator, nor Class Counsel, nor any other party to this Settlement is responsible for any Claim Forms that are mailed but not timely

received by the Settlement Administrator. If you want to confirm receipt of your Claim Form, please send an email to NorthShoreSettlement@lc.org, or call 407-875-1776, **no earlier than two weeks after you have mailed it** (to allow for receipt and processing).

Option B: Object to the Settlement

The Court must assess the overall fairness and reasonableness of the Settlement to the Class. Even if Class Members submit a Claim Form, they may comment on or object to the Settlement's Programmatic Relief and to the monetary relief if they have not opted out of the monetary relief.

To have your comment or objection to the Settlement considered by the Court or to speak at the Final Approval Hearing, your written comment or objection to the Settlement must (1) be signed and submitted to the Settlement Administrator; (2) include the name of this proceeding, *Doe I, et al. v. NorthShore University HealthSystem*, 1:21-cv-05683 (N.D. Ill.); (3) include an explanation of why you think you are a member of the Settlement Class; (4) include a detailed description of the basis of the comment or objection; (5) state whether you intend to appear at the Final Approval Hearing (if you will appear through a lawyer, identify your lawyer by name, address, and telephone number); and (6) be mailed to the Settlement Administrator and postmarked on or before **November 18, 2022**. You need not be represented by an attorney to comment on or object to the Settlement.

Settlement Administrator's address:	NorthShore Employee Vaccine Settlement P.O. Box 23678 Jacksonville, FL 32241-3678	
Class Counsel's address:	Horatio G. Mihet Roger K. Gannam Liberty Counsel P.O. Box 540774 Orlando, FL 32854 (407) 875-1776 NorthShoreSettlement@lc.org	
NorthShore's counsel's address:	Marc R. Jacobs Seyfarth Shaw LLP 233 South Wacker Drive Suite 8000 Chicago, IL 60606 (312) 460-5000 mjacobs@seyfarth.com	Kevin P. Simpson Winston & Strawn LLP 35 West Wacker Dr. Chicago, IL 60601-9703 (312) 558-3761 kpsimpson@winston.com

Option C: Opt Out and Exclude Yourself from the Settlement

If you do not want to participate in the Settlement and wish to retain your own rights to sue NorthShore separately for the legal claims covered by this Settlement, you must request to Opt Out of, or be excluded from, this Settlement. If you Opt Out, you will not be eligible for any Monetary Award from the Settlement, and you will not be permitted to object to, or comment upon, the Settlement in court proceedings. Even so, you will keep any rights you might have to sue NorthShore separately for the legal claims covered by this Settlement.

Any Class Member who wishes to Opt Out must mail to the Settlement Administrator a written, signed Request for Exclusion, which is a statement that they are opting out of the Settlement, at the address listed below. To be effective, this opt-out statement must be postmarked on or before **November 18, 2022** and must include the following language:

I hereby Opt Out of the class action Settlement in the lawsuit *Doe 1, et al. v. NorthShore University HealthSystem*, 1:21-cv-05683 (N.D. Ill.). I understand that, by requesting to be excluded from the monetary settlement in this case, I will receive no money from the Settlement Fund created under the Settlement Agreement, and I will not be permitted to object to, or comment upon, the Settlement in court proceedings. I understand that I may bring a separate legal action seeking damages, but I might receive nothing or less than what I would have received if I had filed a claim under the class Monetary Award procedure in this case.

The Settlement Administrator's address is:

NorthShore Employee Vaccine Settlement
P.O. Box 23678
Jacksonville, FL 32241-3678

Class Members who submit a Request for Exclusion may rescind their Opt-Outs (*i.e.*, you may change your mind and stay in the Class). To be effective, such rescissions must be submitted in writing and received by the Settlement Administrator by **December 16, 2022**, at least one business day before the Final Approval Hearing (or "Fairness Hearing") on **December 19, 2022**. Class Members who submit timely and valid requests for exclusion will have no right to object to the Settlement in Court and will no longer be represented by Class Counsel.

You may not Opt Out of the Programmatic Relief that will be provided as part of this Settlement.

6. What Will Happen if the Settlement is Approved

If you do not request to be excluded (opt-out), you will remain a part of the Settlement Class and be eligible to receive payment from the Settlement Fund (if you submit a timely and valid Claim Form). The Court will hold the Final Approval Hearing and you, as a Class Member, will be represented by Class Counsel at no cost to you. If the Court gives Final Approval to the Settlement, you will receive a payment from the Settlement Fund within 60 days. To be eligible to receive a share of the Settlement Fund, you must fill out, sign, and submit a Claim Form to the Settlement Administrator postmarked by the claim submission deadline of **November 18, 2022**, and your claim form must be actually received by the Settlement Administrator by **November 28, 2022**.

7. Release

If the Court grants Final Approval of the Settlement, then all Settlement Class Members who do not Opt Out will release NorthShore from all employment-related claims arising at any time before the date of final Settlement approval by the Court. The Settlement Agreement (available at www.lc.org/NorthShore) defines the claims that will be released by Settlement Class Members who do not exclude themselves from the Settlement (see page 3 of the Settlement Agreement, “Released Claims”). To “release” a claim means that you cannot sue NorthShore or related parties for any of the claims covered by the release. Unless you Opt Out of the Settlement, you will be covered by the release and lose your claims, even if you do not submit a Claim Form for a Monetary Award.

8. How Settlement Awards Will Be Calculated

Each Class Member may be eligible for a Monetary Award from the Settlement Fund. To receive a Monetary Award, Class Members must fill out and submit a Claim Form.

Based on currently available information, it is estimated that approximately 523 current and former NorthShore Team Members are members of the Class, and that approximately 204 of them received COVID-19 vaccination to avoid termination (the “Compliance Allocation Group”) and 269 of them were terminated or resigned based upon their religious declination of a COVID-19 vaccine (the “Termination Allocation Group”). After payment of expenses, Service Awards to the Named Plaintiff, and attorney’s fees and costs, nine percent (9%) of the remaining Settlement Fund will be distributed in equal shares to those who file valid and timely Claim Forms within the Compliance Allocation Group, and ninety-one percent (91%) of the remaining Settlement Fund will be distributed in equal shares to those who file valid and timely Claim Forms within the Termination Allocation Group. If the Settlement is approved by the Court, if the above estimates are accurate, and if all or nearly all eligible Class Members submit timely and valid claim forms, then persons in the Compliance Allocation Group may recover approximately \$3,000.00 each, and persons in the Termination Allocation Group may recover approximately \$25,000.00 each. These estimates are not guaranteed to be accurate, and the amount of individual payments will not be determined until all claims have been timely received and processed, and the Court issues final approval of the Settlement.

Class Counsel will be available to assist Class Members in the claims process. You may also retain your own attorney to assist you in this process, at your own expense. Your Claim Form will remain strictly confidential. Neither your Claim Form nor its contents will be disclosed to the public. NorthShore cannot take any adverse action against any current or future Team Member based upon their participation in this Settlement.

All Monetary Awards will be reviewed and approved by the Settlement Administrator appointed by the Court to make sure they are fair and consistent. All Monetary Awards are final, binding, confidential, and non-appealable.

9. Potential Tax Consequences for Award

Any award you receive from the Settlement Fund will have tax consequences for you. It will be reported to you and the IRS as required by law. You will be solely responsible for satisfying any tax due from your award.

Class Counsel are not tax advisors and cannot advise you on any tax matters. Class Counsel urge you to consult your tax advisor for answers to any questions you may have about the tax implications of any potential award.

10. The Lawyers Representing You and the Class

As a Settlement Class Member, the following Class Counsel represents you:

Horatio G. Mihet
Roger K. Gannam
Liberty Counsel
P.O. Box 540774
Orlando, FL 32854
(407) 875-1776
NorthShoreSettlement@lc.org

Unless you elect to exclude yourself from the Settlement, Class Counsel will continue to represent you (and other Class Members) in connection with the Settlement's implementation at no cost to you. Although it is not required, you may retain your own attorney at your own expense.

The Lawyers' Fees for Representing the Class

Class Counsel have pursued these claims on behalf of the Named Plaintiffs and the Class without any payment for their services or reimbursement for the litigation expenses they incurred. If you are a Class Member and receive an award from the Settlement Fund, you will not owe any fees or expenses to the lawyers who represented you as part of the Class. Class Counsel will ask the Court to award them attorneys' fees and expenses of 20% of the Settlement Fund, which will be paid from the Settlement Fund.

11. Terms and Payments Specific to the Named Plaintiffs

Class Members have also been represented in this litigation by Named Plaintiffs Jane Does 1 through 13. The Named Plaintiffs may participate in the Settlement claims process just like any other Class Member. In addition, Class Counsel will ask the Court to grant a Service Award of \$260,000 to be equally split among the Named Plaintiffs who do not Opt Out of the Settlement. As is typical in class actions, the Service Award recognizes the benefits the Named Plaintiffs achieved for the Class, the risks they faced in bringing the case, and the time and effort they spent pursuing the lawsuit and the Settlement for Class Members.

12. The Final Approval Hearing

The Final Approval Hearing on the Settlement will be held before the Honorable John F. Kness at 9:00 a.m. on **December 19, 2022**, in room 1725 of the Everett McKinley Dirksen United States Courthouse, 219 S Dearborn St., Chicago, IL 60604.

At the hearing, the Court will determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The Court will also consider the amount of fees and expenses to award to Class Counsel, the amount of the Service Awards to grant to the Named Plaintiffs,

and whether, in accordance with the Settlement, an order and judgment should be entered that effectively ends the lawsuit.

Attendance at the Final Approval Hearing

You are welcomed but not required to attend the hearing. Class Counsel will appear at the Final Approval Hearing on behalf of all Class Members, at no cost to you. If you file an objection, you may (but are not required to) attend the hearing to talk about your reasons for objecting. If you did not Opt Out and you filed your written objection on time, then the Court will consider your submission. You may also hire a lawyer to attend for you, at your own expense, but it is not required.

If the Court gives Final Approval to this Settlement, the Court's judgment will be final and binding on all Class Members who have not timely opted out.

13. Getting More Information

If you have more questions or still are not sure whether you are included in the Class, you can get free help at www.lc.org/NorthShore. The answers to most questions can be found on the settlement website, but if you need additional help, you can email Class Counsel at NorthShoreSettlement@lc.org, or call Class Counsel at 407-875-1776.

This Notice contains only a summary of the terms of the Settlement. For further information, the complete terms of the Settlement Agreement, and several other documents connected with the Settlement are available for review and download at www.lc.org/NorthShore.

Again, the important deadlines are:

- Last Day to Opt Out of the Settlement Class: **November 18, 2022**
- Last Day to Object to the Settlement: **November 18, 2022**
- Last Day to Submit a Claim Form: **November 18, 2022**
- Last Day for Settlement Administrator to Receive Claim Form: **November 28, 2022**
- Final Approval Hearing: **December 19, 2022, at 9:00 a.m.**

**PLEASE DO NOT CALL OR CONTACT THE JUDGE, THE COURT CLERK, OR
NORTSHORE WITH QUESTIONS ABOUT THIS NOTICE.**

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS
Doe 1, et al. v. NorthShore University HealthSystem, No. 1:21-CV-05683

CLAIM FORM INSTRUCTIONS

This claim form is for Settlement Class Members. The Settlement Class includes the following persons:

“All NorthShore Team Members who: (1) between July 1, 2021, and January 1, 2022, submitted to NorthShore a request for religious exemption and/or accommodation from its Vaccine Policy requiring COVID-19 vaccination; (2) were denied a religious exemption and/or accommodation; and (3) either received a COVID-19 vaccine to avoid termination or were discharged or resigned based upon their religious declination of a COVID-19 vaccine.”

DO NOT submit this claim form unless you meet the definition above.

To receive a payment from the settlement, you must complete and submit this form postmarked by **November 18, 2022**, and the Settlement Administrator must actually receive your completed form by **November 28, 2022**.

How to Complete this Claim Form

1. On or around September 13, 2022, the Settlement Administrator will mail Settlement Class Members (at the last address on file with NorthShore) an individualized claim form, with a unique ID and PIN for each Settlement Class Member. **To expedite processing, it is strongly encouraged and preferred that you submit the individualized claim form.** However, if you do not timely receive an individualized form, you may submit a generic claim form obtained from the settlement website, www.lc.org/northshore. **Under no circumstances should you submit more than one form.**
2. You must fill out the enclosed claim form and submit it to the Settlement Administrator by U.S. Mail sent to the following address:

NorthShore Employee Vaccine Settlement
P.O. Box 23678
Jacksonville, FL 32241-3678
3. If you have any questions, **please first refer to the settlement website**, www.lc.org/northshore. You may also contact Class Counsel by calling 407-875-1776, or by email to NorthShoreSettlement@lc.org.
4. You must notify the Settlement Administrator if your contact information changes after you send your Claim Form.
5. **DEADLINE – Your Claim Form must be postmarked by November 18, 2022.**
6. To be eligible for a payment from the Settlement Fund, in addition to being postmarked by November 18, 2022, **your claim form must be actually received by the Settlement Administrator by November 28, 2022.** Neither the Settlement Administrator, nor Class Counsel, nor any other party to this Settlement are responsible for any Claim Forms that are mailed but not timely received by the Settlement Administrator. If you want to confirm receipt of your Claim Form, please send an email to NorthShoreSettlement@lc.org, or call 407-875-1776, **no earlier than two weeks after you have mailed it** (to allow for receipt and processing).
7. If your claim is approved, then payment will be mailed by check to the address provided in Section I of this Claim Form.

**UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF ILLINOIS**

Northshore Employee Vaccine Settlement
PO Box 23678
Jacksonville, FL 32241-3678

In re: *Doe 1, et al. v. NorthShore University HealthSystem*
Case No. 1:21-CV-05683

Postmaster: Do Not Mark Barcode

«keyline»

«fname» «lname»

«addrline1»

«addrcity» «addrstate» «addrzip»

Include this ID when corresponding about this case.

Notice ID: «creditorid»

PIN: «pin»

NorthShore Employee Vaccine Settlement Claim Form

Instructions: Complete both sides and sign this Claim Form. You must notify the Settlement Administrator if your contact information changes after you submit this form. You must submit this form **postmarked no later than November 18, 2022**. Please type or print legibly.

Section I – Your Contact Information

First Name / MI

Last Name

Mailing Address

City / State / Zip

Email Address

Daytime Phone

Is your name or address different from your employment record at NorthShore HealthSystem? YES: ☐ NO: ☐

If YES, please submit with this Claim Form a color, legible copy of your state issued driver's license or ID card, and proof of your name or address change (such as a marriage or divorce certificate, and/or a utility bill in your name at your new address).

Section II – Employment Verification

To confirm your identity and to prevent potential fraudulent claims, you must provide your NorthShore Employee ID Number (including Northwest Community Healthcare or Swedish Hospital Employee ID Number), **and** either your Social Security Number **or** your Tax ID Number. This information will be held confidentially and not shared with the public.

Employee ID No.

Start Date
(MM/DD/YYYY)

Last Position Held

Social Security No.

or Tax ID No.

Section III – Class Membership

Answer each of the questions below by marking an "X" in the appropriate box.

1. Are you a current or former NorthShore Team Member?

Yes: ☐ No: ☐

2. Did you submit to NorthShore a request for a religious exemption or accommodation from NorthShore's vaccine policy requiring COVID-19 vaccination between July 1, 2021, and January 1, 2022?
If you answered **Yes**, state the approximate date of your request.

Yes: ☐ No: ☐

Date:

3. Did NorthShore deny your request for a religious exemption and/or accommodation?

Yes: ☐ No: ☐

4. Answer **ONE** of the following.

a. Did you receive the COVID-19 vaccine to avoid termination?
If **Yes**, state the approximate date of your vaccination.

Yes: ☐ No: ☐

Date:

b. Were you discharged, or did you resign, for declining to receive the COVID-19 vaccine?
If **Yes**, state the approximate date of your discharge or resignation.

Yes: ☐ No: ☐

Date:

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Section IV – Verification and Attestation Under Oath

By signing below and submitting this Claim Form, I hereby swear under penalty of perjury that, to the best of my knowledge: (1) the information provided in this Claim Form is true and correct, (2) I have not submitted another claim in connection with this Settlement, and (3) I know of no other person that has submitted a claim on my behalf.

Release of Claims

By signing below, I also understand that, if the Court grants Final Approval of the Settlement, then all Settlement Class Members who do not Opt Out—including Settlement Class Members who submit this Claim Form—will release NorthShore from all employment-related claims of religious discrimination arising at any time before the date of final Settlement approval by the Court. I understand that the Settlement Agreement (available at www.lc.org/NorthShore) defines the claims that will be released by Settlement Class Members who do not exclude themselves from the Settlement (see page 3 of the Settlement Agreement, “Released Claims”). I understand that to “release” a claim means that I cannot sue NorthShore or related parties for any of the claims covered by the release. I understand that Opt Out instructions are provided in the Notice of Class Action Settlement, Proposed Settlement Agreement, and Final Approval Hearing.

 Signature

 Date (MM/DD/YYYY)

 Print Your Full Name
Reminder Checklist

1. Please make sure you answered all the questions on both sides of the claim form.
2. Make sure that you signed and dated the claim form.
3. Please keep a copy of your completed claim form for your own records.
4. If you have any questions, **please first refer to the settlement website**, www.lc.org/northshore. You may also contact Class Counsel by calling 407-875-1776, or by email to NorthShoreSettlement@lc.org.
5. Mail your claim form, **postmarked by November 18, 2022**, to:
 NorthShore Employee Vaccine Settlement
 P.O. Box 23678
 Jacksonville, FL 32241-3678
6. To be eligible for a payment from the Settlement Fund, in addition to being postmarked by November 18, 2022, **your claim form must be actually received by the Settlement Administrator by November 28, 2022**. Neither the Settlement Administrator, nor Class Counsel, nor any other party to this Settlement are responsible for any Claim Forms that are mailed but not timely received by the Settlement Administrator. If you want to confirm receipt of your Claim Form, please send an email to NorthShoreSettlement@lc.org, or call 407-875-1776, **no earlier than two weeks after you have mailed it** (to allow for receipt and processing).

 Administrator Use Only - Do not write below this line

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NorthShore Settlement Deadlines

Settlement Agreement Section #	Event	Proposed Deadline
	Execution of Agreement	Completed on: 7/28/2022
	Filing of Joint Motion to Approve Settlement	Completed on: 7/29/2022
6	Doe 14 to File Stipulation for Dismissal	Completed on: 7/29/2022
	Preliminary Approval of Settlement	Completed on: 8/5/2022
10.3.4	NorthShore to Provide Notices Required by 28 U.S.C. § 1715, and Confirmation/Copies to Class Counsel	Completed on: 8/8/2022
	Submitting Proposed Notice, Notice Plan and Claim Forms for Court Approval	8/17/2022
14.2	Parties to Agree on Individual Release for Class Representatives	8/29/2022
5.3	NorthShore to Provide Documentation re: Class Size and Claimant Eligibility	8/29/2022 (30 days after Execution, plus weekend time)
7.1	NorthShore to Deposit \$30,000.00 into Settlement Fund	9/5/2022 (30 days after Preliminary Approval, plus weekend time)
9.3.1	Named Plaintiffs to Seek Rehire	9/5/2022 (30 days after Preliminary Approval, plus weekend time)
	Notice and Claim Forms to be Mailed to Settlement Class Members (and otherwise distributed per Notice Plan)	9/13/2022 (15 days after NS provides Section 5.3 Documents)
	Reminder Notice to be Mailed to Non-Responsive Class Members	10/13/2022 (30 days after initial notice)
9.3.1	NorthShore to Communicate Rehire Details to Named Plaintiffs Who Seek Rehire	11/8/2022 (10 days before Opt-Out Deadline)
8.2.1	Claim Form Submission	11/18/2022 (30 days prior to Fairness Hearing, plus weekend time)
11.1	Opt-Out Deadline	11/18/2022 (30 days prior to Fairness Hearing, plus weekend time)

12.2	Objections Deadline (and deadline for objectors to notify of intent to appear at Fairness Hearing)	11/18/2022 (30 days prior to Fairness Hearing, plus weekend time)
11.4	Settlement Administrator to Provide Opt-Out List to Parties and the Court	11/25/2022 (7 days after Opt-Out Deadline)
5.2	Plaintiffs to Exercise Re-negotiation or Termination Remedy	12/2/2022 (14 days after Claim Submission Deadline)
14.2	Class Representatives to Execute Individual and Separate Release	12/2/2022 (14 days after Opt-Out Deadline)
11.7	NorthShore to Exercise Re-negotiation or Termination Remedy	12/9/2022 (14 days after Settlement Administrator Provides Opt-Out List)
11.6	Rescission of Opt-Outs to be received by Settlement Administrator	12/16/2022 (day before Fairness Hearing, plus weekend time)
	Fairness Hearing	12/19/2022 @ 9 a.m.
	Final Approval / Effective Date of Settlement	TBD by Court
9.2	Effective Date for Revision of NorthShore's System Vaccine Program	Same as the Final Approval Date
FRAP 4	Appeal Deadline for Final Approval and Judgment	30 days after Final Approval and Judgment
7.2	NorthShore to Deposit \$10,307,500.00 into Settlement Fund	35 days after Final Approval
8.2.6	All Valid and Timely Claims Paid	60 days after Final Approval
9.3.2	Termination Allocation Group Members to Seek Rehire from NorthShore	90 days after Final Approval
9.1	Expiration of Programmatic Relief	3 years after Final Approval