

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**MARTIN ZAKARIAN, and)
MARY JONES, on behalf of themselves and)
those similarly situated,)**

Plaintiffs,)

v.)

**THE RAWLINGS COMPANY LLC,)
RAWLINGS FINANCIAL SERVICES, LLC,)
and RAWLINGS & ASSOCIATES, PLLC,)**

Defendants.)

Case No.: 4:24-cv-00229

**AFFIDAVIT OF ERIKA BRITTON ON BEHALF OF RG/2 CLAIMS
ADMINISTRATION LLC REGARDING NOTICE TO THE CLASS**

I, Erika Britton, hereby declare and state as follows:

1. I am a Project Manager of Claims Administration for RG/2 Claims Administration LLC (“RG/2”), whose address is 30 South 17th Street, Philadelphia, PA 19103. I am over the age of 18, have personal knowledge of the matters set forth herein, and if called upon to do so, could testify competently to them.

2. As detailed below, I confirm that notice was completed in accordance with the parties’ instructions and the Court’s order approving the notice plan.

3. RG/2 Claims is an experienced and full-service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2’s experience includes the provision of notice and administration services for settlements arising from antitrust, consumer fraud, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 has administered and distributed in excess of \$2 billion in class action settlement proceeds. The

executive profiles and the company overview are available at www.rg2claims.com.

4. On May 27, 2026, we were appointed as Notice Administrator for the Notice of the Rawlings Class Action Lawsuit.

5. Prior to July 23, 2026, we were provided with Class Member lists by Class Counsel for the Rawlings Class Action.

6. Prior to the notice mailing and in order to locate the most recent addresses for the 2,201 Class Members, RG/2 Claims ran the Class Member lists through the United States Postal Service's National Change of Address database and Lexis Nexis. These processes are commonly known as "skip tracing" and are standard notice and claims administration industry practice, including at RG/2 Claims.

7. On July 23, 2026, RG/2 Claims arranged for the printing and mailing, by First Class U.S. Mail, of the Notice to each of the 2,200 Class Members. One (1) Class Member did not have a mailing address and therefore was not mailed a Notice. Non-personalized copies of the mailed Notices are attached hereto as **Exhibit A**.

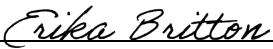
8. The Notices informed Class Members of their right to request exclusion from the settlement, provided the request is received or postmarked on or before September 21, 2026.

9. On July 23, 2026, RG/2 made available the Settlement Website at www.medicareadvantageorganizationlawsuit.com. The website includes the following:

- a. The "Homepage" contains a brief summary of the Lawsuit and advises the Class of their rights under the Lawsuit.
- b. The "Notice" page contains pdf copies of the Notice for the Rawlings Class Action.

- c. The “Court Documents” page contains pdf copies of the Class Action Complaint, Defendants’ Answer to Class Action Complaint, Class Certification Order, Renewed Joint Notice Plan, and Notice Plan Order.
- d. The “Contact Us” page contains the contact information of the Notice Administrator and Class Counsel.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 30, 2026, at Philadelphia, Pennsylvania.



Erika Britton

Exhibit A

LEGAL NOTICE

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

***Zakarian, et al. v. The Rawlings
Company, LLC, et al.
Case No. 4:24-cv-00229***

1-866-742-4955

www.MedicareAdvantageOrganizationLawsuit.com

*Zakarian, et al. v. The Rawlings
Company, LLC, et al.*
c/o RG/2 Claims Administration LLC
PO Box 59479
Philadelphia, PA 19102-9479

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
MAG



NUMERIC EQUIVALENT

Postal Service: Please do not mark barcode

<<FullName>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

If you are a Missouri or Kansas citizen who had a Medicare Advantage Organization lien recovered or subrogated through The Rawlings Company LLC, and/or its affiliates, you may be a Class Member in a Certified Class Action.

READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS ARE AFFECTED WHETHER YOU ACT OR DO NOT ACT.

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

A federal court has certified classes of Missouri and Kansas citizens who had a Medicare Advantage Organization lien subrogated through The Rawlings Company LLC, and/or its affiliates. The certification may affect your rights. This notice summarizes the federal court's certification, but, for additional information, including the longer notice and certain filings and orders in the federal court with the precise language, please see www.MedicareAdvantageOrganizationLawsuit.com. You may also access the Court docket in this case through the PACER system at <https://ecf.mowd.uscourts.gov/cgi-bin/ShowIndex.pl>, or by visiting the office of the Office of the Clerk of Court, 400 E 9th St, Kansas City, MO 64106, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. The case is called *Zakarian, et al. v. The Rawlings Company, LLC, et al.*, Case No. 4:24-cv-00229. Please do not telephone the Court or the Court Clerk's Office to inquire about this notice process.

Plaintiffs allege that The Rawlings Company LLC, and/or its affiliates breached class members' rights when it failed to offset "procurement costs" as required under federal law when recovering or subrogating a Medicare Advantage Organization's medical lien. The Defendants vigorously deny these allegations and state that they acted properly at all times. Defendants contend they had the contractual right not to offset "procurement costs." The Court did not rule in favor of either party. Instead, the Court certified the proposed classes of Kansas and Missouri citizens.

You are an absent class member if you are or were a Missouri citizen, since January 1, 2019, or Kansas citizen, since January 1, 2021, and you had a Medicare Advantage Organization medical lien recovered or subrogated by The Rawlings Company LLC and/or its affiliates and Rawlings did not offset procurement costs. Given the Court's certification, as an absent class member, you have the right to do nothing and remain an absent class member or affirmatively exclude yourself from a certified class. **Your deadline to act ends on September 21, 2026.** Thereafter, any absent class member who did not exclude himself/herself will remain a class member.