

SEVENTH JUDICIAL CIRCUIT COURT OF COMMON PLEAS
SPARTANBURG COUNTY, SOUTH CAROLINA

NOTICE OF PROPOSED SETTLEMENT

**If You Received Medical Treatment at Mary Black Memorial Hospital or
Gaffney H.M.A. in South Carolina from January 1, 2014 and Your Medical
Bills Were Not Submitted to Your Health Insurance Provider,
You Could Be Eligible to Benefit from a Class Action Settlement
Valued at \$2.25 Million.**

A court authorized this notice. This is not a solicitation.

- Please read this notice carefully. Your legal rights may be affected whether or not you act.
- This Settlement (the “Settlement Agreement”) resolves a lawsuit concerning the Defendants’ alleged policy and practice of refusing to bill health insurance that impacted Settlement Class Members’ own relationships with their health insurance provider, including commercial health insurance and governmental payors, in the case entitled *Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated (“Plaintiffs”), v. Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc. (“Defendants”), C. A. No. 2017-CP-42-00219* (the “Lawsuit”).
- You may be eligible to receive a *pro rata* share of the Net Settlement Fund based on the Settlement of the Lawsuit.
- The Court has preliminarily approved the Settlement on behalf of the Settlement Class. The Court has not entered judgment on the merits and has not determined that there is any merit to Plaintiffs’ claims or that Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc., including Gaffney H.M.A., LLC (collectively, “Defendants”) engaged in any wrongdoing. This notice is solely to advise you of the proposed Settlement of the Lawsuit and of your rights in connection with the Settlement.
- Your legal rights are affected whether you act, or don't act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY NO LATER THAN AUGUST 31, 2026	If you believe that you qualify as a Settlement Class Member, then submit a Claim Form. This is the only way to receive a <i>pro rata</i> Settlement payment.
OBJECT BY AUGUST 31, 2026	You can file an objection with the Court explaining why you disagree with the Settlement. See Questions 17 – 18.
EXCLUDE YOURSELF BY AUGUST 31, 2026	The only option that allows you to exclude yourself from the Settlement and retain any rights you may have against the Defendants. If you exclude yourself (also known as opting out), you will NOT receive a payment from the Settlement. See Questions 13 – 16.
ATTEND THE FAIRNESS HEARING ON OCTOBER 27, 2026	Ask to speak in Court about the Settlement. See Questions 19 – 22.
DO NOTHING	Get no payment and give up any rights you may have against the Defendants. See Question 23.

Payments will only occur if the Court gives final approval to the settlement & after appeals are resolved. Please be patient.

These rights and options – **and the deadlines to exercise them** – are explained in this notice. A copy of the Settlement is available online at www.MaryBlackClassAction.com or by calling **1-800-789-6490**.

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BASIC INFORMATION

1. Why did I get this notice package?

Records from the Defendants indicate that you or someone in your family (the “Patient”) received medical treatment at the hospitals that were operated by Mary Black Health System, LLC (Mary Black Health System - Spartanburg) or and Gaffney H.M.A., LLC (Mary Black Health System - Gaffney) sometime from January 1, 2014 and the Defendants did not bill the Patient’s valid health insurance provider for said treatment but instead sought payment from the Patient, or from the Patient’s proceeds of a separate tort action, or from an at-fault third-party’s insurance carrier. If that is true, then the Patient may be a Settlement Class Member.

This notice is to inform you about the Settlement that has been reached which may affect your rights, including your right to object to, or exclude yourself from the Settlement. You have the right to know about the Settlement and about your legal rights and options before the Court decides whether to approve the Settlement.

The Court in charge of this Lawsuit is the South Carolina Court of Common Pleas for Spartanburg County, and the case is known as *Blackwell, et al. v. Mary Black Health System, LLC et al., C. A. No. 2017-CP-42-00219*.

The people who brought the Lawsuit are called the Named Plaintiffs. They are Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., and they alleged that they represented a class of similarly situated person, of which you may be a part.

The companies and the persons the Plaintiffs sued are called the Defendants. The Defendants are Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc.

2. What is the Lawsuit about?

The class action Lawsuit asserts that the Defendants had a policy and practice of refusing to bill health insurance that impacted every member of the Settlement Class by interfering with Settlement Class Members’ own relationships with their health insurance provider. The Lawsuit also alleges that the Defendants attempted to collect larger payments from Settlement Class Members than what the Defendants separately contracted to accept from the health insurance providers. The Defendants deny these allegations and deny that they are liable to Plaintiffs or the purported class in any way.

3. Why is this Lawsuit a class action?

In a class action, one or more people called Class Representatives or Named Plaintiffs (in this Lawsuit, Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr.) sue on behalf of not only themselves but other people who have similar claims. The Class Representatives and all of the people with similar claims are a class or class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

As part of this Settlement the Defendants have consented to the creation of a Settlement Class to distribute the Settlement proceeds.

4. Why is there a settlement?

Plaintiffs and the Defendants have determined that it is in their mutual best interest to settle this Lawsuit due to the uncertainties of trial, benefits of settlement, associated costs of continued litigation, likely appeals, and inconvenience and interference with personal matters and business operations. The Settlement was reached through lengthy negotiations between the parties.

The Court did not decide in favor of Plaintiffs or the Defendants. After a thorough investigation and discovery into the facts of this Lawsuit, Plaintiffs, and the Defendants agreed to the Settlement Agreement. The Class claims against the Defendants were settled because Class Counsel and Plaintiffs, acting as the Class Representatives, believe that the amount of the Settlement is fair and reasonable in light of the strength and weaknesses of the lawsuit and other factors.

WHO IS INCLUDED IN THE SETTLEMENT?

To see if you will get money from this Settlement, you first have to figure out if you are a Settlement Class Member.

5. How do I know if I am part of the Settlement?

For purposes of the Settlement, the Parties have agreed, and the Court has ruled that everyone whose circumstances align with the Settlement Class description is a Settlement Class Member:

“All individuals who, from January 1, 2014, received any type of healthcare treatment from any entity located in South Carolina that is or was owned or affiliated with Defendants, including Mary Black Health System, LLC and Gaffney H.M.A., LLC, while being covered by valid health insurance (including but not limited to all commercial health insurance, Medicare, and Medicaid), and whose medical bills resulting from that treatment were not submitted to their health insurance provider for potential payment and instead the individual either had their recovery reduced as a result of Defendants’ policy or paid Defendants as a result of the policy.”

Based on information available to the Parties, if you have received this notice, you may be a Settlement Class Member. If you are a Settlement Class Member, you should read this notice carefully, and, if you wish to participate in the settlement recovery offered, you must comply with the requirements and deadlines set forth herein.

6. Are there exceptions to being included?

Excluded from the Class are: (1) All people who timely and validly exercise their right to opt out of the Settlement Class; (2) Employees of the Defendants; and (3) Employees of the Court and their immediate family.

7. I’m still not sure if I am included. What are my next steps?

If you are still not sure if you are included, or have any questions about the settlement, you can ask for free help. You can review helpful information at the website **www.MaryBlackClassAction.com** or call the Claims Administrator at **1-800-789-6490** for more information. Remember the deadline to submit a claim is **August 31, 2026**. Please do not call the Court.

THE SETTLEMENT'S BENEFITS

8. What does the Settlement provide?

The proposed Settlement establishes a \$2,250,000 Gross Settlement Fund to be paid by Defendants in exchange for a release of all claims in the Lawsuit. After payment of the Class Representative Plaintiffs' Awards, costs of Notice and Class Settlement Administration, and Class Counsel's Attorneys' Fees and Costs, the remaining Net Settlement Fund will be used to pay valid claims on a *pro rata* basis.

This \$2,250,000 Gross Settlement payment by Defendants represents the settlement terms negotiated by the parties and Class Counsel through arm's length negotiations and takes into account a balancing of the risk of going to trial and the amount of a potential verdict. You have the right to opt out of or exclude yourself from the settlement, and, if you exercise that right, you will receive nothing from this settlement.

9. How much will my payment be?

If the Settlement is approved by the Court, you may receive a monetary payment if you submit a valid and timely claim. The exact amount of the monetary payment to each Settlement Class Member is not currently known, but will be based on several factors, including (1) the amount of class-action expenses that are approved by the Court; (2) the number of Settlement Class Members who file valid and timely claims; and (3) the amount of net loss suffered by each and all Settlement Class Members who file claims and elect to receive monetary payments.

Payments will be made *pro rata* from funds available based upon each Class Member's Loss. Class Member's Loss is the amount determined to be what was paid by you, or on your behalf, to Mary Black Health System or Gaffney H.M.A., LLC for medical services rendered to you from January 1, 2014, which could have been billed to your health insurance provider. Presently, the maximum total aggregate amount of all the Class Members Losses is believed to be \$2,036,538.28.

The Claim Form for most potential Settlement Class Members contains a number for that Class Member's Loss. This figure is based upon business records obtained by Class Counsel. If you disagree with your Class Member's Loss or the Class Member's Loss is listed as "UNKNOWN," you must state the amount you believe to be your Class Member's Loss, and you must also provide any documents or evidence you have which supports your claim. Within 30 days of receiving your claim, the Claims Administrator will notify you whether your claim is accepted, partially accepted, or rejected. If the Claims Administrator rejects your claim, or if you disagree with the approved amount, you may apply to have the Court determine the amount of your claim.

SETTLEMENT CLASS MEMBERS WHO DO NOT TIMELY SUBMIT VALID CLAIM FORMS WILL BE DEEMED TO HAVE WAIVED ANY RIGHT TO RECEIVE SETTLEMENT BENEFITS INCLUDING PAYMENTS BUT WILL STILL BE BOUND BY THE TERMS OF THE SETTLEMENT.

10. How can I get a monetary payment?

If you agree with the reported Class Members Loss listed on your Claim Form and you have no objections to the Settlement, then to be eligible to receive your final *pro rata* share of the benefits of the Mary Black Class Settlement, you must complete, sign, date, and return your Claim Form such that it is postmarked or emailed **by no later than August 31, 2026** to:

Email: claims@MaryBlackClassAction.com

Mail: **Mary Black Class Settlement**
c/o The Notice Company
P.O. Box 455
Hingham, MA 02043

If your claim is confirmed and the Court approves the settlement, you will then receive your benefits of the settlement.

11. When would I get my payment?

If the Court grants final approval to the Settlement and after any appeals are resolved, the *pro rata* Settlement payments will be distributed to approved claims. If the Court approves the Settlement after the hearing on **October 27, 2026**, there may be appeals. We don't know how much time it could take to resolve any appeals that may be filed. Information will be posted online at www.MaryBlackClassAction.com.

REMAINING IN THE SETTLEMENT CLASS

12. What am I giving up if I stay in the Settlement Class?

If you do not submit a complete and timely written request for exclusion, you will stay in the Settlement Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against the Defendants about the legal and factual issues in *this* case; namely your claim against Defendants related to the payment for the medical services rendered to you (see Question 2). It also means that all of the Court's orders will apply to you and legally bind you. If you sign the Claim Form, you will agree to a "Release," attached to the Claim Form, which describes exactly the legal claims you give up if you participate in the Settlement Class.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. Who has the right to be excluded?

If you are a Settlement Class Member and you don't wish to benefit from this settlement, but you want to maintain any potential right you may have to sue the Defendants, on your own, about the legal and factual issues in this case, then you must take steps to opt-out of the Settlement. This is called excluding yourself or is sometimes referred to as opting out of the settlement class.

14. How do I exclude myself from the Settlement Class?

To exclude yourself from the Settlement, you must send a letter by mail that includes the following:

1. Your full name, current mailing address and telephone number;
2. A statement saying that you "want to exclude yourself from the Settlement Class in *Blackwell, et al. v. Mary Black Health System, LLC, et al.* (C.A. No. 2017-CP-42-00219)"; and
3. Be signed and dated by you.

To be valid, exclusion requests must be mailed with a postmark on or before **August 31, 2026**. Mailed exclusion requests should be sent to:

Mary Black Exclusions
c/o The Notice Company
P.O. Box 455
Hingham, MA 02043

No request for exclusion will be considered valid unless all of the information described above is included. No further opportunity to request exclusion will be given in this Lawsuit unless ordered by the Court. If you choose to be excluded from the Settlement Class, you will not: (a) be entitled to any Settlement payment; (b) be able to object to the Settlement; (c) be legally bound by any judgment entered in the Lawsuit; and (d) be precluded from suing the Defendants in the future, if your rights have not expired by operation of law.

After the number of opt outs has been determined, the Defendants can terminate the settlement if any of the Defendants decides that the number of opt outs is excessive.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer representing me in this Lawsuit?

The law firms of John B. White, Jr. P.A., and the Simmons Law Firm, LLC, have represented you and other Settlement Class Members throughout the course of this Lawsuit. These lawyers are called Class Counsel. You will not be charged by or for the services of these lawyers; however, they will be compensated from the gross settlement proceeds as approved by the Court. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will apply for an attorneys' fee of approximately forty percent (40%) of the Gross Settlement Fund, which would be paid out of the \$2,250,000 Gross Settlement Fund. Class Counsel will also apply for reimbursement of expenses of estimated to be approximately Fifty Thousand Dollars (\$50,000), and seek incentive payments for each of the Named Plaintiffs of \$10,000. The total incentive payments will not exceed \$30,000. Class Counsel spent considerable time and effort prosecuting this Lawsuit. They undertook the Lawsuit without cost to the Class Members, advancing all expenses. They did so with the understanding that they would be paid only if they were successful in recovering benefits for the Class.

OBJECTING TO OR COMMENTING ON THE SETTLEMENT, PLAN OF DISTRIBUTION, ATTORNEYS' FEES AND LAWSUIT EXPENSES, AND AWARDS TO CLASS REPRESENTATIVES

You can tell the Court that you don't agree with the settlement or some part of it.

17. How do I tell the Court that I don't like the Settlement?

If you are a Settlement Class Member and you do not like any part of the Settlement including the Class Counsel's fees and costs, you can ask the Court to deny approval by filing an objection. If you exclude yourself, you cannot object to the Settlement. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. You can give reasons why you think the Court should not approve it. The Court will consider your views. If your objection is rejected, you will be

bound by the final judgment just as if you had not objected.

Written objections must include the following information:

1. The Settlement Class Member's full name, current mailing address, telephone number, and if you are being assisted by a lawyer, the lawyer's name, address and telephone number;
2. The case name and number of the Lawsuit (*Blackwell, et al. v. Mary Black Health System, LLC, et al.* (C.A. No. 2017-CP-42-00219));
3. A statement establishing your membership in the Settlement Class;
4. In clear and concise terms, the specific reasons for the objection, and any evidence or legal authority the Settlement Class Member believes supports the objection; and
5. Your signature.

If you are submitting a written objection, it must be submitted to the Court by mailing it to the Clerk of the Court for the South Carolina Court of Common Pleas for Spartanburg County at the address below, with copies mailed to Class Counsel and Settling Defendants' Counsel, so that it is **delivered or postmarked on or before August 31, 2026**:

Clerk of the Court	
Clerk of the Court Spartanburg County, South Carolina Court of Common Pleas 180 Magnolia St, FL 2 Ste 2100 Spartanburg, SC 29306	
Class Counsel	
John B. White, Jr. Marghretta H. Shisko Griffin L. Lynch John B. White, Jr. P.A. P.O. Box 2465 Spartanburg, SC 29304	John S. Simmons Rachel G. Peavy Simmons Law Firm, LLC 1711 Pickens Street Columbia, SC 29201
Settling Defendants' Counsel	
James Lynn Werner Katon E. Dawson, Jr. Parker Poe Adams & Bernstein LLP 1221 Main Street, Suite 1100 Columbia, SC 29201	

SETTLEMENT CLASS MEMBERS WHO DO NOT TIMELY MAKE THEIR OBJECTIONS IN THIS MANNER WILL BE DEEMED TO HAVE WAIVED ALL OBJECTIONS TO THE SETTLEMENT AND WILL NOT BE ENTITLED TO BE HEARD AT THE FAIRNESS HEARING ON **OCTOBER 27, 2026**. You may, but need not, enter an appearance through counsel of your choice. If you do, you will be responsible for your personal attorney's fees and costs.

This description of the settlement is general and does not cover all of the issues and proceedings thus far. In order to see the complete Settlement Agreement, including the individual terms of the settlement, you should visit the website at **www.MaryBlackClassAction.com**.

18. What if I do not object to the Settlement but I dispute the amount of Class Member Loss reflected on my Claim Form?

If you have no objection to the Settlement and wish to obtain the benefits of the Settlement but object to the amount of net loss reflected on your Claim Form, you must complete and return the Claim Form with the box checked regarding your claimed dispute and provide documentation that supports your claimed loss. The Claim Form and supporting documents must be returned to the Claims Administrator, (see address in Question 10), postmarked on or before **August 31, 2026**. You need to set forth your disagreement with the amount of Class Member Loss and provide all documentation supporting your position. The Claims Administrator will then deny, partially approve or approve your claim and provide you with notice of that determination. If you disagree with the Claims Administrator's determination, you will be given the opportunity to appeal to the Court. Instructions for filing such an appeal will be provided with the Claims Administrator's determination.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement and to address any appeals of the Claims Administrator's determinations. You may attend and you may ask to speak, but you don't have to.

19. When and where will the Court consider the Settlement, the plan of distribution, request for attorneys' fees and litigation expenses, and award to Class Representatives?

On **October 27, 2026, at 11:00 a.m.**, a hearing will be held on the fairness of the proposed settlement (the "Fairness Hearing"). At the hearing, the Court will consider whether the settlement is fair, reasonable, and adequate, and the Court will also decide the amount of attorneys' fees and costs to be awarded. If there are any objections to the settlement or the request for attorneys' fees and costs, the Court will consider and rule upon them. The hearing will take place before the Honorable J. Mark Hayes, II, Circuit Court Judge, Seventh Judicial Circuit, at 180 Magnolia St, Spartanburg, SC 29306. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

20. Do I have to come to the hearing?

Class Counsel will answer questions the Court may have at the Fairness Hearing. But you are welcome to come to the Fairness Hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend the Fairness Hearing, but it's not necessary.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you would have to do the following by **October 17, 2026**: (1) provide a written notice to the Clerk of Court indicating that you intend to be heard at the Fairness Hearing; (2) indicate the basis for your appearance along with a statement that indicates why you oppose or support the Settlement or certification of the Class; and (3) provide a copy of such written notice and any related briefs, documentation, or other materials to the Court, Class Counsel, and Settling Defendants' Counsel. The written notice must contain your full name and current mailing address.

22. What happens if the Court approves the proposed Settlement?

If the Court approves the proposed Settlement, it will enter a judgment that will dismiss the claims of all Settlement Class Members covered by the Settlement Agreement who did not opt out on the merits and with prejudice as to those claims. All non-excluded Settlement Class Members, as well as their respective heirs, personal representatives, agents, attorneys, parent, subsidiary, and/or affiliate corporations, shareholders, directors, officers, joint venturers, partners, trustees, receivers, insurers, reinsurers, servants, employees, representatives, administrators, successors, predecessors, and assigns shall be forever barred from prosecuting their own lawsuits and shall be deemed to have released (a) Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; Gaffney H.M.A., LLC; CHSPSC, LLC; and Professional Account Services, Inc.; (b) any person, partnership, firm, corporation, limited liability company, trust, organization, or other entity in which the Defendants have a controlling interest or which is or was legally related to or affiliated with the Defendants; and (c) with respect to each of the Persons in subsections (a) and (b), their respective past or present members, managers, directors, officers, employees, insurers, reinsurers, sureties, attorneys, agents, partners, principals, advisors, investment advisors, auditors, accountants, trustees, and any other entity in which any corporate parent has a controlling interest or which is or was related to or affiliated with any such parent, successors and predecessor entities, the heirs, and members of their Immediate Family, and anyone acting or purporting to act for or on behalf of any of them or their successors from all claims, causes of action, or losses of any kind whatsoever that Settlement Class Member has or may claim to have against the Defendants and their affiliates that related to any of the conduct that has or could have been alleged or otherwise referred to in the this lawsuit.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you'll get no money from this settlement. But, unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendants about the legal and factual issues in this case, ever again.

GET MORE INFORMATION

24. Where can I get more information?

This notice summarizes the proposed Settlement. More details are in a Settlement Agreement. You can get additional information and a copy of the Settlement Agreement by visiting **www.MaryBlackClassAction.com**. Information is also available by calling toll-free 1-800-789-6490.

**ALL INQUIRIES CONCERNING THIS NOTICE SHOULD BE MADE TO
THE CLAIMS ADMINISTRATOR OR TO CLASS COUNSEL.
PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE.**

DATE: June 15, 2026