

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

**If You Were A Missouri Citizen, Since January 1, 2019, or Kansas Citizen, Since January 1,
2021, Who Had A Medicare Advantage Organization Medical Lien Recovered or
Subrogated by The Rawlings Company LLC and/or Its Affiliates**

This Class Action May Affect Your Rights

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

- Please read this Notice carefully as a class action lawsuit may affect your rights.
- This Notice provides you with information regarding a class action lawsuit filed against The Rawlings Company LLC, Rawlings Financial Services, LLC, and Rawlings & Associates, PLLC (“Rawlings” or “Defendants”) over the recovery or subrogation of Medicare Advantage Organization medical liens relating to physical injuries sustained by Missouri or Kansas citizens. Your legal rights may be affected whether or not you take action.
- The Court has issued an order allowing the lawsuit to proceed as a class action that includes various individuals who had a Medicare Advantage Organization medical lien recovered or subrogated, without the offset of procurement costs, by Rawlings for Missouri citizens since January 1, 2019, and Kansas citizens since January 1, 2021 (hereafter referred to as the “Class Members” or the “Class”).
- In the lawsuit, Plaintiffs claim that Rawlings has failed to follow federal law for the application of a “procurement costs” offset when recovering or subrogating Medicare Advantage Organization medical liens.
- The Court has not yet concluded that Rawlings did anything wrong. There has been no award of damages yet, and whether any money becomes available to anyone will depend on the outcome of this lawsuit.
- The Plaintiffs must prove their breach of contract and negligence *per se* claims against Rawlings at a trial. Rawlings denies wrongdoing and alleges it was contractually allowed to not offset “procurement costs” and complied with all applicable laws and regulations.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
Do Nothing	You will stay in this class action lawsuit. Await the outcome. And share in the benefits, if any become available. By doing nothing, you will remain a Class Member and will keep the right to recover money and other benefits that may result from a trial or a settlement. If you remain in the Class, however, you will give up any rights to sue Rawlings on your own about the same legal claims at issue in this lawsuit, and you will be bound by judgment.
Exclude Yourself	Exclude yourself from this lawsuit. You will get no benefit from it. But you will retain the right to retain your own attorney and to sue Rawlings on your own. If you request to be excluded from this class action lawsuit, and if any money or benefits later become available, you will not be eligible to share in those benefits. However, you will keep any rights to sue Rawlings on your own about the same legal claims in this lawsuit.

- Your rights and options – and the deadlines to exercise them – are explained in more detail in this Notice. To be excluded, you must act before September 21, 2026.

BASIC INFORMATION

1. Why was this Notice sent to me?

This Notice is to inform you this lawsuit has been “certified” as a class action. This means that the lawsuit meets the requirements for a class action under the law and may proceed to trial as a class action.

The Honorable Judge Stephen Bough of the United States District Court for the Western District of Missouri is overseeing this case. The case is known as *Zakarian, et al. v. The Rawlings Company, LLC, et al.*, Case No. 4:24-cv-00229. The individuals who sued Rawlings are referred to as the Plaintiffs, and the companies being sued are called the Defendants. The Plaintiffs in this case are Martin Zakarian and Mary Jones. The Defendants are The Rawlings Company LLC, Rawlings Financial Services, LLC, and Rawlings & Associates, PLLC.

2. What is the lawsuit about?

The Plaintiffs claim that Rawlings has and continues to violate a provision of federal law which requires Rawlings to reduce the Medicare Advantage Organization medical lien it is recovering or subrogating by a proportionate share of the procurement costs which were incurred in obtaining monies to satisfy the lien.

Rawlings asserts that it has complied with all applicable laws and regulations.

The final outcome of this lawsuit has not been decided, and the Plaintiffs continue to litigate the claims against Rawlings.

3. Why is this a class action?

In a class action, one or more individuals called “Class Representatives” (in this case, Martin Zakarian and Mary Jones) filed an action against Rawlings on behalf of those who have similar claims against Defendants. All of these individuals are “Class Members.” One court will resolve the issues for all class members, except for those who wish to properly exclude themselves from the Class (see Question 10).

4. What are Plaintiffs asking for?

Plaintiffs will be seeking money damages from Rawlings for the Class for the additional amounts recovered by Defendants. The Plaintiffs are seeking proper payments for all Medicare Advantage Organization liens recovered or subrogated related to Missouri and Kansas citizens since January 1, 2019 and January 1, 2021, respectively.

WHO IS INCLUDED IN THE LAWSUIT?

5. Who is part of the Class?

You may be a Class Member in this class action case if you were a Missouri or Kansas citizen since January 1, 2019 and January 1, 2021, respectively, and were subject to a Medicare Advantage Organization lien recovered or subrogated by Rawlings without an offset for procurement costs.

6. Are there exceptions to being included?

This Class does not include officers, directors or employees of any Defendant, any trial judge who may preside over this action, court personnel and their family members and any juror assigned to this action.

7. I’m still not sure if I’m included in the lawsuit.

If you are not sure whether you are included in the lawsuit or if you have any questions, you may contact Class Counsel at: Taylor Foye, HORN AYLWARD & BANDY, LLC, 2600 Grand Boulevard, Suite 1100, Kansas City, MO 64108, Telephone: (816) 421-0700; or Bryan McCart, THE LAW OFFICES OF BRIAN TIMOTHY MEYERS, 1044 Main Street, Suite 400, Kansas City, Missouri 64105, Telephone: (816) 842-0006, Facsimile: (816) 842-6623.

8. Is there money available now?

No money or benefits are available at this time because the Court has not yet decided whether Rawlings is liable for not offsetting procurement costs and interest and the parties have not settled the case. Plaintiffs are seeking to recover monetary benefits. There is no guarantee that money benefits will ever be obtained in addition to the royalty payment reimbursements you have already received as a result of this class action lawsuit.

YOUR RIGHTS AND OPTIONS

If you are a member of the Class, you have a choice whether to remain a member of the Class and to be represented by the Class Representatives and by Class Counsel, or to exclude yourself. Either choice will have its consequences, which you should fully understand before making your decision.

9. What happens if I do nothing?

If you do nothing, you will automatically remain a part of the Class. You will be legally bound by all Court orders (including any judgment entered for or against the Class or any future settlement), which means you will not be able to sue, or continue to sue, Rawlings about the specific legal claims at issue in this case.

10. What if I don't want to be a part of the Class?

If you decide not to participate in the lawsuit, you must properly exclude yourself from the Class. If you exclude yourself, you may choose to take no further action regarding your Medicare Advantage Organization lien's procurement cost offset or you may file an individual action against Defendant(s), but you will not receive any benefits that may result from this lawsuit. You will not be bound by any Court orders, and you will keep your right to sue Rawlings on your own regarding the issues in this case.

To exclude yourself from the Class, you must mail a letter stating that you want to be excluded from the Class. Your letter must also include:

- Your full name, current address, property address (if different), telephone number, and your signature; and
- A statement substantially to the effect of "I/We hereby request that I/we be excluded from the certified Class in the *Zakarian, et al. v. The Rawlings Company, LLC, et al.*, Case No. 4:24-cv-00229 and wish to receive none of the benefits of the trial."

You must mail your letter postmarked by September 21, 2026, to:

Taylor Foye
HORN AYLWARD & BANDY, LLC
2600 Grand Boulevard, Suite 1100
Kansas City, MO 64108

11. If I don't exclude myself, can I sue later?

No. Unless you properly exclude yourself from the Class, you give up any right to sue Rawlings for the claims being resolved in this lawsuit.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this lawsuit?

Yes. The Court has appointed Joseph A. Kronawitter and Taylor P. Foye with the firm Horn Aylward & Bandy, LLC and Brian T. Meyers and Brian C. McCart with the Law Offices of Brian Timothy Meyers as "Class Counsel" to represent the interests of the Class. Their contact information is below:

HORN AYLWARD & BANDY, LC
2600 Grand Boulevard, Suite 1100
Kansas City, MO 64108
Telephone: (816) 421-0700
Facsimile: (816) 421-0899

THE LAW OFFICES OF
BRIAN TIMOTHY MEYERS
1044 Main Street, Suite 400
Kansas City, Missouri 64105
Telephone: (816) 842-0006
Facsimile: (816) 842-6623

If you want to be represented by a different lawyer, you may hire one to appear in Court for you at your own expense.

13. How will the lawyers be paid?

You do not have to pay Class Counsel. Class Counsel will seek an award of attorneys' fees and costs from the Court, to be paid separately by Rawlings or out of the recoveries made by Class Members, if any. Class Counsel will seek up to 33.33% of the amount recovered by the Class.

THE TRIAL

14. When and where will the trial take place?

If the case is not settled or otherwise resolved, Plaintiffs will have to prove their claims at a trial, which has not yet been set by the Court. Once the trial date has been set, you will be able to obtain that trial date by reviewing the Court's docket or you will be able to obtain the trial date from Class Counsel's website. The trial will be held at the United States District Court for the Western District of Missouri, Charles E. Whittaker U.S. Courthouse, 400 E 9th St, Kansas City,

MO 64106. You may also contact the Court at (816) 512-1800 to be informed regarding the date, time, and location of the trial. During the trial, a jury will hear all of the evidence, so that a decision can be reached about whether the Plaintiffs or Defendants are right about claims asserted in the lawsuit and the defenses thereto.

15. Will I get money after the trial?

There is no way to know at this time. If you do not exclude yourself from the Class, and if the Plaintiffs win at trial, you will receive your portion of the overall judgment by check in the mail.

GETTING MORE INFORMATION

16. How do I get more information about the lawsuit?

This Notice summarizes the lawsuit. You can find a copy of Plaintiffs' Class Action Complaint, the Class Certification Order, and other important information about the lawsuit at www.MedicareAdvantageOrganizationLawsuit.com.