

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF ALABAMA
 SOUTHERN DIVISION**

IN RE BLUE CROSS BLUE SHIELD	:	
ANTITRUST LITIGATION	:	Master File 2:13-cv-20000-RDP
MDL 2406	:	
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	:	This document relates to
	:	Subscriber Track cases

**MOTION FOR APPROVAL OF A PLAN FOR NOTICE AND
 APPOINTMENT OF CLAIMS ADMINISTRATOR**

COME NOW the Subscriber Class Representatives¹ (on behalf of themselves and the Settlement Classes) (“Subscriber Plaintiffs”) in the above-styled action and hereby move this Court for an order directing notice of the proposed Settlement Agreement reached by Subscriber Plaintiffs and Settling Defendants, and appointing JND Legal Administration as the Claims Administrator. This Motion is also supported by the Self-Funded Sub-Class Representative.

In support of this Motion, Subscriber Plaintiffs are submitting herewith the Subscriber Plaintiffs’ Memorandum of Law in Support of Motion for Approval of a Plan for Notice and Appointment of Claims Administrator (“Notice Brief”) and the Declaration of Jennifer M. Keough (“Keough Declaration”) as Exhibit 1. Attached to the Keough Declaration is Jennifer M. Keough’s Biography as Exhibit A, the proposed Notice Plan as Exhibit B, a copy of the long-form notice as Exhibit C, a copy of the Claim Form as Exhibit D, copies of e-mail notice, postcard notice, and publication notice as Exhibits E, F, and H, examples of digital advertisements as Exhibit G, a copy of the print notice as Exhibit H, samples of the class member entity digital ads as Exhibit I, samples

¹ Capitalized terms not otherwise defined herein shall have the meaning given them in the Settlement Agreement attached to Subscriber Plaintiffs’ Motion for Preliminary Approval of Proposed Class Settlement, filed contemporaneously herewith.

of internet search ads as Exhibit J, a copy of the multichannel news release microsite as Exhibit K, and a copy of the reminder digital ads as Exhibit L. This Motion is also supported by the Preliminary Approval Motion, brief in support, and attached exhibits.

For the reasons set forth in the Notice Brief, as well as those set forth in the supporting materials and in the Preliminary Approval Motion, Subscriber Plaintiffs' Motion should be granted, and the Court should enter a preliminary approval order in the form proposed by Subscriber Plaintiffs in their Preliminary Approval Motion.

Date: October 30, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

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/s/ Michael D. Hausfeld
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