

ATTENTION:

Were you enrolled with The Alieria Companies through Unity Healthshare?

If so, this notice provides important information about your rights.

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

- The Alieria Companies, Inc. d/b/a Alieria Healthcare, Inc. (and certain wholly owned subsidiaries) (collectively, “Alieria”) are in bankruptcy. Alieria (“Debtor”) has filed a Plan of Liquidation (“Plan”), in which Alieria’s remaining assets will be transferred to a Liquidating Trust for the benefit of Alieria’s creditors as set forth in the Plan.
- Under the Plan, individuals who enrolled in Unity Healthshare through Alieria are recognized as unsecured creditors of Alieria.
- As part of the Plan, the Bankruptcy Court has certified a class of individuals who enrolled in Unity Healthshare through Alieria. The Court has appointed four individuals from the class as “Class Representatives” and appointed counsel for the Unity Class including Sirianni Youtz Spoonemore Hamburger, PLLC.

Your Legal Rights As a Member of the Unity Class

You may comment on or object to the proposed Plan.

You have the right to comment on, object to or support the proposed Plan. The Court will decide whether to approve or reject the proposed Plan at a Confirmation Hearing currently scheduled for August 14, 2023 at 11:00 a.m. before the Honorable Thomas. M. Horan, at the U.S. District Courthouse, 824 North Market Street, 5th Floor, Courtroom 7, Wilmington, DE 19801.

You may submit written comments or objections that you wish to be considered by the Court no later than August 4, 2023, at 4:00 p.m. prevailing Eastern time. You should not call the Court.

You may do nothing.

The Unity Class Representatives will vote on the Plan on behalf of the Unity Class. You are not able to separately cast a vote for the Plan although you may comment on or object to it. (See above)

Your claim will automatically be allowed as either (i) the total monthly payments you made to Unity/Alieria or (ii) the total medical expenses submitted to Unity/Alieria for payment but which were unpaid, whichever is larger, according to the records held by Alieria. You will be notified of this amount at a later time by the Unity Class Claims Administrator. At that time, if you think the amount is incorrect, you will have the opportunity to correct it.

All final and approved claims are very unlikely to be paid in full. Under the Plan, only a percentage of each approved claim is likely to be paid.

FREQUENTLY ASKED QUESTIONS

1. Why did I get this notice?

You are receiving this notice because Alieria's records indicate that you were enrolled with Alieria and Unity Healthshare between October 31, 2016 and August 11, 2018. **You are not actually a Class Member simply because you got this notice.**

This notice explains that the Court has preliminarily approved Plan of Liquidation and certified a class that may affect you. Judge Thomas M. Horan of the United States Bankruptcy Court for the District of Delaware is overseeing this bankruptcy. The bankruptcy action is known as *In re: The Alieria Companies, Inc., et al.*, Case No. 21-11548 (TMH)(Jointly Administered).

Only individuals who meet the following definition of a class member are in the class:

All individuals who made one or more monthly payments to The Alieria Companies, Inc., anytime between November 1, 2016 and June 30, 2019, for a healthcare plan that included a Unity Healthshare component.

2. What is a bankruptcy action, and how will it resolve?

In December 2021, Alieria filed for bankruptcy and elected to liquidate rather than reorganize. That means that Alieria no longer conducts business and will be liquidated for the benefit of its creditors.

A Disclosure Statement describing the Plan has been preliminarily approved by the Bankruptcy Court. The Plan is not effective until it is finally confirmed by the Bankruptcy Court at a confirmation hearing following a vote by the creditors and presentation of any required evidence. The Plan includes a settlement agreement among the major creditors about how the creditors will be paid from Alieria's remaining assets, which will be transferred to a trust fund.

The Alieria Trust will be governed by a Trust Committee and run by a Liquidating Trustee. The Bankruptcy Court will continue to have jurisdiction over the Alieria Trust. It is expected that the Alieria Trust will not have enough money to pay all creditors the full amounts they are owed. Under the Plan, each group of creditors will receive different amounts, depending on their group.

You can read more about the Alieria Bankruptcy and the Plan of Liquidation at: www.sylaw.com/aliera.

3. Why is a class certified in the Bankruptcy case?

When a class is certified by a Court, the Court recognizes that it is more efficient to have a group of individuals represented by one or more class members, called "Class Representatives." The Court has certified a class here, and appointed Class Representatives to make decisions on behalf of all Unity Class Members. The Unity Class Representatives will vote on the Plan on behalf of the Unity Class. Lawyers from Sirianni Youtz Spoonemore Hamburger, who have been appointed Unity Class counsel can be reached at 206-838-3210 with questions.

4. What does the proposed Plan Provide?

The main points of the Plan are described below. You can read the entire **Plan** at www.sylaw.com/aliera or <https://dm.epiq11.com/aliera>. It is also summarized in this Class Notice.

The Plan is not final until the Court confirms the Plan after the Confirmation Hearing.

- The Plan establishes the claim of Unity Class Members as \$297,903,437.00. This represents the total monthly payments received by Alieria on behalf of Unity Healthshare members.
- Unity Class Members' claims are designated as Class 4 claims. The other Class 4 claims are those of the Sharity Members represented by the Sharity Liquidating Trust (allowed at \$362,764,161.00). Members who enrolled with Alieria, whether through Unity, Sharity or both, are in the same Class.
- Trade creditors are designated as Class 3 claims.
- The Plan provides that after payment of all Allowed Administrative Claims, Priority Tax Claims, Class 1 other secured claims and class 2 Unsecured Priority Claims, following establishment of a Trust Expense Fund, Class 3 and 4 claims will be paid as follows to the extent funds are available in the Liquidating Trust:
 - The first \$2,500,000 shall be distributed to Class 3 claims on a *pro rata* (percentage) basis.
 - The next \$6,000,000 shall be distributed to Class 4 claims on a *pro rata* basis.
 - Any remaining funds shall be distributed 60% to Class 4 and 40% to Class 3 on a *pro rata* basis; however, once Class 3 claims receive 75% of their allowed claims, then all remaining funds go to Class 4 claims until they receive 75% of their allowed claims. After that, funds shall be distributed 60% to Class 4 and 40% to Class 3 on a *pro rata* basis until they are paid in full.
- Counsel for the Alieria Trust, including the Unity Class Counsel, will be paid according to retention agreements between the Alieria Liquidating Trustee and the law firms. No Unity Class Member will have to pay attorneys' fees for any counsel for the Alieria Trust.

5. When will the Funds from the Alieria Trust Be Available?

The Court must approve the Plan and any other conditions to effectiveness set forth in the Plan must be satisfied or waived before the Plan is effective and the Alieria Trust established.

At present, it is not anticipated that the Alieria Trust will have sufficient funds to make significant disbursements at the time the Plan becomes effective. The Alieria Trust will pursue various lawsuits and claims against third parties to recover funds for the creditors, including the Unity Class. When the Alieria Liquidating Trustee determines that there are sufficient funds, disbursements will be made according to the confirmed Plan.

6. What are my rights and options?

- **You May Comment on, Object to, or Support the Proposed Plan.**

The Court will hold a hearing on the proposed Plan, consider comments and confirm or reject the Plan.

- The Court currently has scheduled a hearing for August 14, 2023 at 11:00 a.m. prevailing Eastern time. The hearing will be located at United States Courthouse, 824 North Market Street, 5th Floor, Courtroom 7, Wilmington, DE 19801.
- The hearing date, time, and location can change without further notice. Please contact Class Counsel if you want to confirm the date and time of the hearing as that date approaches.

All comments on the Plan must be submitted in advance to the address listed below. You are not required to submit comments or attend the confirmation hearing.

You may attend the confirmation hearing and may choose to bring a legal representative if you wish and at your own expense. You must tell the Court if you plan to come to the hearing to object to, comment on, or formally support the Plan by filing a written response on or before August 4, 2023 at 4:00 p.m. prevailing Eastern time.

If you choose to submit written comments and appear at the Court hearing, your written response must be received no later than August 4, 2023 at 4:00 p.m. prevailing Eastern time and must be mailed to:

In re Alieria, Case No. 21-11548 (TMH)
United States Courthouse
824 North Market Street, 3rd Floor,
Wilmington, DE 19801

All communications with the Court must be in writing, and Class Members should not attempt to call the Court.

- **You may do nothing.**

You do not need to take action to preserve your claims in the Bankruptcy.

After the Alieria Trust is formed, the Unity Class Administrator will inform Unity Class members as to the total monthly premiums paid or unpaid medical expenses, whichever is larger, according to Alieria's records. You will have the opportunity to correct the claim if it is not accurate. The final and approved claim amount will be used to determine the amount of funds, if any, you may receive from the Alieria Liquidating Trust.

10. Where can I get more information?

For information about your rights related to the bankruptcy, you may refer to the information at www.sylaw.com/aliera or <https://dm.epiq11.com/aliera>.