

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

KAILA GONZALEZ, individually and as a representative of a class of similarly situated persons, on behalf of the NORTHWELL HEALTH 403(B) PLAN,

Plaintiff,

v.

NORTHWELL HEALTH, INC.,

Defendant.

Case No: 1:20-cv-03256-RPK-TAM

**NOTICE OF PENDENCY OF CLASS ACTION AND PROPOSED SETTLEMENT**

***IF YOU WERE A PARTICIPANT IN THE NORTHWELL HEALTH 403(b) PLAN BETWEEN JULY 21, 2014 AND MARCH 9, 2026, YOU COULD RECEIVE A PAYMENT AND YOUR LEGAL RIGHTS WILL BE AFFECTED BY THIS CLASS ACTION SETTLEMENT.***

***A Federal Court authorized this Notice. This is not a solicitation from a lawyer.***

This Notice advises you of the settlement (“Settlement”) of a lawsuit against Northwell Health, Inc. (“Defendant” or “Northwell”). In the lawsuit, Plaintiff Kaila Gonzalez (“Plaintiff,” and with Defendant, the “Parties”) alleges that Defendant violated the Employee Retirement Income Security Act (“ERISA”) in connection with its administration of the Northwell Health 403(b) Savings Plan (the “Plan”). Defendant denies the allegations and denies that it engaged in any improper conduct.

**YOU SHOULD READ THIS ENTIRE NOTICE CAREFULLY BECAUSE YOUR LEGAL RIGHTS WILL BE AFFECTED, WHETHER YOU ACT OR NOT.**

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice.

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## **BASIC INFORMATION**

### **1. Why did I get this Notice?**

Records indicate that you are or may be a Current Participant, Former Participant, Beneficiary or Alternate Payee of a Participant or Former Participant,<sup>1</sup> of the Plan at any time on or after July 21, 2014, through and including March 9, 2026 (the “Class Period”).

You are receiving this Notice because you have a right to know about the proposed settlement of a class action lawsuit in which you are potentially a Class Member before the Court decides whether to approve the Settlement.

This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible to receive them, and how to get them.

The lawsuit is pending in the United States District Court for the Eastern District of New York (the “Court”), it is captioned as *Gonzalez v. Northwell Health Inc.*, Case No. 1:20-cv-03256-RPK-TAM (E.D.N.Y.), and it is brought against Northwell.

### **2. What is this lawsuit about?**

On July 21, 2020, Plaintiff filed an action against Defendant, alleging that its administration of the Plan violated ERISA. Since the filing of the action, the Parties engaged in litigation, including investigating the claims and other developments, briefing and arguing a motion to dismiss, and exchanging written discovery and document productions. In May 2025, the Parties mediated the action and were ultimately able to reach the terms of the Settlement explained in this Notice. Defendant has denied and continues to deny any wrongdoing or liability and will continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

### **3. What is a class action lawsuit?**

In a class action lawsuit, one or more people called “class representatives” sue on their own behalf and on behalf of other people who they allege have similar claims. One court resolves all the issues for all class members in a single lawsuit. Plaintiff is the proposed class representative in this lawsuit, and is sometimes referred to in this Notice as the “Class Representative” or as “Plaintiff.”

### **4. Why is there a settlement?**

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiff and the other Class Members are entitled to receive compensation. Class Counsel has conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiff and Class Counsel agree that the Settlement is in the best interests of the Settlement Class and the Court has not made any finding that Defendant has done anything wrong or violated any law or regulation.

### **5. How do I get more information about the Settlement?**

This Notice summarizes the proposed settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement, which is available at [www.strategicclaims.net/northwell403b](http://www.strategicclaims.net/northwell403b), by contacting Class Counsel (see answer to question 12 for contact information) or the Settlement Administrator (see answer to question 6 for contact information), or by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.nyed.uscourts.gov/>.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

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<sup>1</sup>Capitalized terms not otherwise defined in this Notice shall have the same meaning as in the Settlement Agreement, which is available at [www.strategicclaims.net/northwell403b](http://www.strategicclaims.net/northwell403b).

## **6. Who will administer the Settlement?**

The Settlement Administrator, Strategic Claims Services, will administer the Settlement. You may contact the Settlement Administrator by: (a) sending a letter to Northwell Health 403(b) Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson St, Suite 205, Media, PA 19063; (b) sending an e-mail to [info@strategicclaims.net](mailto:info@strategicclaims.net); (c) visiting the Settlement website at [www.strategicclaims.net/northwell403b](http://www.strategicclaims.net/northwell403b); or (d) calling toll-free at (866) 274-4004.

### **THE SETTLEMENT BENEFITS – WHAT THE SETTLEMENT PROVIDES**

## **7. What does the Settlement provide?**

Defendant has agreed to pay a total of \$2,750,000.00 to the Class Members (“Gross Settlement Amount”). Class Counsel intends to ask the Court to approve up to one-third of that amount for attorneys’ fees (an amount no greater than \$916,666.66), approve the reimbursement of litigation expenses actually incurred, and approve a Case Contribution Award in the amount of up to \$10,000.00 to the Class Representative. The amount that will be available for distribution to Class Members (“Net Settlement Amount”) will be the Gross Settlement Amount *minus* the amounts used for other approved settlement purposes (Case Contribution Award, Court-approved Attorneys’ Fees and Costs to Class Counsel, Administrative Expenses, and certain taxes and tax-related costs).

## **8. How may I benefit from the Settlement?**

You may be entitled to payment of a portion of the Net Settlement Amount. The amount available to each Current Participant, Former Participant, Beneficiary, or Alternate Payee will be determined by a Plan of Allocation.

As explained below, if you are a Current Participant or Beneficiary or Alternate Payee of a Current Participant and you have an Active Account in the Plan, you do not need to take any action to receive payment under the Settlement. Payments to Current Participants, Beneficiaries or Alternate Payees of Current Participants with Active Accounts in the Plan shall be made into these persons’ individual investment accounts in the Plan.

If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant, and you no longer have an Active Account in the Plan, you will receive payment by check if you are owed more than \$10 under the Settlement.

While you do not need to take any action in order to receive payment under the Settlement, if you wish to update your address or beneficiary information, or to elect a rollover of Settlement funds to another qualified retirement account, please do so using the following page on the Settlement website: [www.strategicclaims.net/northwell403b](http://www.strategicclaims.net/northwell403b).

## **9. How do I submit a claim for a Settlement Payment?**

If you are a Current Participant, Former Participant, or a Beneficiary or Alternate Payee of a Participant, you do not need to submit a claim to be eligible for a payment under the Settlement. You will receive any payment for which you are eligible automatically in your Plan account if you are a Current Participant or by check (or rollover, if elected) if you are a Former Participant.

## **10. What is the Plaintiff receiving from the Settlement?**

Class Counsel intends to ask the Court to award the Class Representative a Case Contribution Award of \$10,000.00 in recognition of the work and effort she expended on behalf of the Class.

## **THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP**

### **11. What do I give up by participating in the Settlement?**

Each Class Member gives Defendant a “release.” A release means you give up your rights to sue Defendant or receive any benefits from any other lawsuit against Defendant if the lawsuit asserts similar claims or relates in any way to the practices or decisions at issue in this lawsuit.

For additional details about the scope of the release, consult the Settlement Agreement or contact Class Counsel. (See answer to question 5 for details.)

## **THE LAWYERS REPRESENTING YOU**

### **12. Do I have a lawyer in this case?**

Yes. The Court has appointed the law firm of Miller Shah LLP as Class Counsel. You will not be charged for the work of these lawyers. If you want to be represented by a different lawyer in this case, you may hire one at your own expense.

### **13. How will the lawyers (Class Counsel) be paid?**

Class Counsel will ask the Court for an award of attorneys’ fees and expenses of up to one-third of the Settlement Amount based upon the value of the Settlement, the time they have devoted to this engagement, and the expenses they have advanced in prosecuting this matter.

## **OPTING OUT OF THE SETTLEMENT**

### **14. Can I exclude myself from the Settlement Class?**

No. The Settlement Class has been certified under Federal Rule of Civil Procedure 23(b)(1). Therefore, as a Class Member, you are bound by any judgments or orders entered in the lawsuit for all claims asserted in the lawsuit or otherwise included as Released Claims (as defined in the Settlement Agreement). If you wish to object to any part of the Settlement, you may write to the Court and counsel about why you object to the Settlement.

## **OBJECTING TO THE SETTLEMENT**

### **15. What does it mean to object?**

Objecting is simply telling the Court that you do not like something about the Settlement. Objecting will not have any bearing on your right to receive the benefits of the Settlement if it is approved by the Court.

### **16. What is the procedure for objecting to the Settlement, including any objection to Plaintiff’s Motion for Attorneys’ Fees and Costs or Case Contribution Award?**

You can ask the Court to deny approval of the Settlement and/or the Motion for Attorneys’ Fees and Costs of Class Counsel or the Case Contribution Award to be requested for the Class Representatives by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue.

The Court, because of an objection or its own discretion, can award less than the amount requested by Class Counsel for attorneys’ fees and expenses or the amount requested for the Case Contribution Award. While such a ruling could affect the timing and amount of settlement payments, any Court ordered reduction in Class Counsel’s attorneys’ fees and expenses or the Case Contribution Award to be paid to the Class Representative will not otherwise affect the finality of the Settlement.

Any objection to the proposed Settlement or Motion for Attorneys’ Fees and Costs or Case Contribution Award must be in writing in accordance with the requirements in the Preliminary Approval Order. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for

hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number as *Gonzalez v. Northwell Health, Inc.*, Case No. 1:20-cv-03256-RPK-TAM (E.D.N.Y.); (b) be submitted to the Court either by mailing them to United States District Court for the New York Eastern District, 225 Cadman Plaza East, Brooklyn, NY 11201, or by filing them in person at any location of the United States District Court for the Eastern District of New York; and (c) be filed or postmarked on or before June 8, 2026. A copy of the objection(s) and supporting materials must also be sent to Class Counsel and Defense Counsel at the addresses noted below on or before June 8, 2026.

Your objection must also include: (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's names and contact information; (2) a written statement of your objection(s), specifying the reason(s) for each objection, including any supporting evidence, and whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (3) copies of any papers, brief, or other documents upon which the objection is based; (4) a list of all persons who will be called to testify in support of the objection; (5) a list of any other objections to any class action settlements you or anyone acting on your behalf has submitted in any court in the United States, whether state, federal, or otherwise, in the previous five years; and (6) your signature, even if you are represented by counsel.

Any party may file a response to an objection by a Class Member at least seven calendar days before the Fairness Hearing.

**ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.**

<b>Clerk of the Court</b>	<b>Class Counsel</b>	<b>Defense Counsel</b>
Clerk of Court United States District Court for the New York Eastern District 225 Cadman Plaza East Brooklyn, NY 11201	Alec J. Berin Anna K. D'Agostino MILLER SHAH LLP 1845 Walnut Street Suite 806 Philadelphia, PA 19103 Telephone: (866) 540-5505 Facsimile: (866) 300-7367 ajberin@millershah.com akdagostino@millershah.com	Melissa D. Hill Gina F. McGuire 101 Park Avenue New York, NY 10178 Telephone: (212) 309-6000 melissa.hill@morganlewis.com gina.mcguire@morganlewis.com

### **THE COURT'S FAIRNESS HEARING**

#### **17. When/where will the Court decide whether to approve the Settlement?**

On July 8, 2026, at 10:00 a.m., before the Honorable Taryn A. Merkl in Courtroom 13D South of the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, NY 11201, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The hearing may be continued from time to time by the Court without further notice, and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time has not been changed and to determine if the hearing is occurring in person or by video or teleconference.

#### **18. Do I have to attend the Fairness Hearing?**

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do not have to go to Court to talk about it. As long as your objection is filed or

postmarked by June 8, 2026, and you comply with the requirements in the answer to question 16 above, the Court will consider it. You may also send your own lawyer at your expense to attend the Fairness Hearing.

**19. May I speak at the Fairness Hearing?**

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at their own expense.

Objectors or their attorneys intending to participate at the Fairness Hearing must file a notice of intention to participate (and, if applicable, the name, address, and telephone number of the objector's attorney) with the Court no later than June 23, 2026. Any objectors, or their counsel, who do not timely file a notice of intention to participate in accordance with this Paragraph shall not be permitted to speak at the Fairness Hearing, except for good cause shown.

**IF YOU DO NOTHING**

**20. What happens if I do nothing at all?**

IF YOU DO NOTHING, YOU AND ALL OTHER CLASS MEMBERS WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS. If you are a Current Participant, Former Participant, or a Beneficiary or Alternate Payee of a Participant, you do not need to take any action to be eligible to receive the Settlement benefits.

DATED: April 8, 2026.

**THIS NOTICE HAS BEEN SENT TO YOU BY ORDER OF  
THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

Northwell Health 403(b) Settlement Administrator  
c/o Strategic Claims Services  
600 North Jackson Street, Suite 205  
Media, PA 19063

**IMPORTANT LEGAL NOTICE – PLEASE FORWARD**

Mail ID  
Name  
Address  
City, State, Zip