

If You Enrolled in the Illinois School of Health Careers' Patient Care Technician Program, You May Be Part of a Class Action Settlement

If you enrolled in the Illinois School of Health Careers' ("ISHC") Patient Care Technician ("PCT") program prior to June 1, 2010, you may be part of a class action settlement and may be able to file a claim for cash and/or the ability to re-enroll in ISHC's CNA course. This notice is only a summary. For more complete information, please read the full notice at www.attorneyzim.com or write to the address below.

What is the Class Action Lawsuit About?

Plaintiffs claim that ISHC misrepresented to students that upon graduation from ISHC's PCT Program, students would be eligible to take the Illinois Certified Nursing Assistant ("CNA") examination to become a CNA, but at the time these representations were made, ISHC was not a State-approved CNA program. Additionally, Plaintiffs claim that ISHC misrepresented that PCT Program students would be able to perform their externship at a location close to their home, but this did not happen. ISHC denies Plaintiffs' allegations and contends that its conduct was lawful.

What Are the Terms of the Settlement?

Under the terms of the proposed settlement, each class member who submits a valid claim may be entitled to cash and/or the ability to re-enroll in ISHC's CNA course. For more details, visit the website or write to the address below.

Who Represents Me?

The Court has appointed an attorney to represent the settlement class. ISHC will pay that attorney's fees and costs up to \$350,000 (minus certain setoffs) if the settlement is approved. You may hire your own attorney, if you wish, at your own expense.

What Are My Legal Rights?

- **If you wish to remain a member of the settlement class**, you do not have to do anything. To receive benefits of the settlement, however, you must submit a claim. If the Court approves the proposed settlement, you will be bound by all Court orders. This means you will not be able to sue ISHC for claims that are covered by the settlement.
- **If you wish to submit a claim for payment and/or re-enrollment in ISHC's CNA course**, visit www.attorneyzim.com and follow the instructions, or call 312.440.0020. All claims, and any required documentation, must be postmarked on or before **April 22, 2013**.
- **If you do not wish to be a member of the settlement class**, you must submit a letter to Class Counsel at the address below, postmarked or otherwise delivered on or before **April 22, 2013**. If you request to be excluded from the settlement class you cannot submit a claim.
- **You can tell the Court if you do not like this proposed settlement** or some part of it if you (1) file the appropriate papers with the Clerk of Court, Circuit Court of Cook County, Richard J. Daley Center, Chicago, IL 60602, and (2) send a copy of those papers to settlement class counsel, Thomas A. Zimmerman, Jr., Zimmerman Law Offices, P.C., 77 West Washington Street, Suite 1220, Chicago, IL 60602 and to counsel for ISHC, Anthony Stamato, Kaye Scholer LLP, Three First National Plaza, 70 West Madison Street, Suite 4200, Chicago, Illinois 60602. The papers must be filed with the Court and postmarked or otherwise delivered to the parties' counsel no later than **April 22, 2013**.

Will the Court Approve the Proposed Settlement?

The Court will hold a Fairness Hearing on May 21, 2013 at 10:30 a.m. to consider whether the proposed settlement is fair, reasonable, and adequate and to consider the motion for Plaintiffs' attorney's fees and expenses and an incentive award to the Plaintiffs who represent the settlement class.

For a copy of the full Notice of Proposed Class Action Settlement and a Claim Form, write to:

Thomas A. Zimmerman, Jr.
Zimmerman Law Offices, P.C.
77 West Washington Street, Suite 1220
Chicago, Illinois 60602

or visit: www.attorneyzim.com