

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

If You Insured a Leased Vehicle Under a USAA California Auto Insurance Policy and Did Not Receive Payment for Sales Tax and Vehicle Regulatory Fees After the Vehicle Was Totaled, You May Be Eligible for a Payment Under a Class Action Settlement.

A court authorized this Notice. This is not a solicitation from a lawyer. You are not being sued.

If you are a Class Member, your legal rights are affected whether you act or don't act.

PLEASE READ THIS NOTICE CAREFULLY

- This Notice provides information about a proposed Settlement of a class action lawsuit regarding the payment of California sales/use tax and vehicle regulatory fees for leased vehicles that were totaled and were insured under a California Automobile Insurance Policy issued by a USAA company. The lawsuit generally alleges that the USAA companies failed to pay the full amount of sales/use tax and vehicle regulatory fees on leased vehicles. This case does NOT involve vehicles that are owned by the USAA policyholder.
- The USAA companies deny any wrongdoing and maintain that they have complied with and exceeded their obligations under California law and their insurance policies. The Court has not ruled on the merits of the claims.
- Under the Settlement, there will be a \$3.05 million Settlement Fund. If the Court approves the Settlement, Current Policyholders will be eligible for a payment based on their share of the Settlement Fund after the payment of attorneys' fees and expenses, any Class Representative Service Award, and the costs of notice and settlement administration. Former Policyholders are eligible for a payment if they return an Address Verification Form. (This process is explained in more detail in Questions 8-14 below.) The exact amount each Class Member will be paid cannot be calculated until the Court approves the Settlement, and the fees, expenses, and total number of participating Class Members are determined.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to ever be a part of any other lawsuit against the USAA companies about the legal claims in this case.
OBJECT	Write to the Court about why you don't like the Settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
<u>CURRENT</u> POLICYHOLDERS: DO NOTHING	Get a share of the Settlement Fund. Current Policyholders do not need to do anything to receive such a payment.
<u>FORMER</u> POLICYHOLDERS: DO NOTHING	Get no payment. Give up rights. If you are a Class Member, the terms of the Settlement will still apply to you. To be eligible for a payment, you must return an Address Verification Form (see Question 9 below).
<u>FORMER</u> POLICYHOLDERS: SUBMIT AN ADDRESS VERIFICATION FORM	If you are a Former Policyholder and submit a timely Address Verification Form, you will be eligible for a share of the Settlement Fund.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve this Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

QUESTIONS? CALL 1-877-879-5074 TOLL-FREE, OR VISIT SpielmanSettlement.com.
 PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR 1-877-879-5074, O VISITAR SpielmanSettlement.com.

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BASIC INFORMATION

1. Why did I get this Notice?

The Court authorized sending you this Notice because you are a possible Class Member. You have a right to know about a proposed Settlement of a class action, and about all of your options, before the Court decides whether to give “final approval” to the Settlement. If the Court approves the Parties’ Class Action Settlement Agreement, and after any objections and appeals are resolved, an administrator appointed by the Court will make the payments that the Settlement allows.

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

The Court in charge of the case is the United States District Court for the Central District of California, Judge Terry J. Hatter, Jr. More information on the lawsuit is in Question 3 below.

2. Who are the Parties?

The person who sued is called the “Plaintiff,” and the companies he sued are called “Defendants.” The Plaintiff in this case is Lester I. Spielman. The Defendants are United Services Automobile Association (“USAA”), USAA Casualty Insurance Company (“USAA CIC”), USAA General Indemnity Company (“USAA GIC”), and Garrison Property and Casualty Insurance Company (“Garrison”). These USAA companies are also sometimes called “Defendants” or the “USAA Entities.”

3. What is this lawsuit about?

This case is *Lester I. Spielman v. United Services Automobile Association et al.*, Case No. 2:19-cv-01359 (U.S. District Court for the Central District of California).

The lawsuit alleges that the USAA companies failed to pay the full amount of sales/use tax and vehicle regulatory fees to people who insured their leased vehicles under a California Automobile Insurance Policy, who submitted a claim for physical damage under their comprehensive or collision coverage, and whose leased vehicle was determined to be a Total Loss, from February 22, 2015, through September 28, 2022.

The Court previously certified a litigation class in December 2021 but did not order notice to be sent. That litigation class is narrower than the Settlement Class, so anyone who was a member of the litigation class (which has now been vacated as part of this Settlement) is a member of the Settlement Class. For more information on the Settlement Class definition, see Question 6 below.

The USAA companies deny that they did anything wrong and maintain that they have complied with and exceeded their obligations under California law and their insurance policies. The Parties, however, have agreed to settle the lawsuit to avoid the cost, delay, and uncertainty of continued litigation.

4. Why is this a class action? What is a class action?

In a class action lawsuit, one or more people, called “Class Representatives,” sue on behalf of people who have similar claims. All these people together are a “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who choose to exclude themselves from the Class.

5. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendants. Instead, both sides agreed to a settlement to avoid the cost, delay, and uncertainty of further litigation, and the people affected will get compensation. The USAA companies have denied all liability in the lawsuit. The Class Representative and Class Counsel think that the Settlement is in the best interests of Class Members.

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WHO IS IN THE SETTLEMENT

To see if you are affected by the proposed Settlement, you first have to determine if you are a Class Member.

6. How do I know if I am part of the Settlement? What is the Class definition?

If you were sent this Notice postmarked on November 28, 2022, that means that the USAA companies' records show that you are a Settlement Class Member.

The Settlement Class is defined as follows:

All individuals and entities insured by the USAA Entities under a California automobile policy whose insurance covered or covers a leased vehicle under private-passenger physical damage coverage, including collision and physical damage other than collision coverage, and who made a first-party claim from February 22, 2015, through September 28, 2022, whose leased vehicle was determined by the USAA Entities to be a Total Loss, and who received a Total Loss Claim Payment from the USAA Entities for the value of the totaled vehicle that did not include the full amount of the Sales Tax and/or Vehicle Regulatory Fees.

Excluded from the Settlement Class are: (1) all officers, employees, and agents of the USAA Entities, Class Counsel, and their immediate family members, and (2) any members of the judiciary assigned to the Action and their immediate families.

“Total Loss” means an insured vehicle that sustained damage, was the subject of a covered first-party property damage claim submitted to one of the USAA Entities under a California Automobile Insurance Policy, and for which the USAA Entity issued a Total Loss Claim Payment.

“Total Loss Claim Payment” means a first-party property damage claim payment made by one of the USAA Entities for a leased vehicle determined to be a Total Loss.

“Sales Tax” means any mandatory sales or use tax collected or assessed by the State of California and any of its counties, cities, or political subdivisions when a vehicle is purchased, leased, or sold.

“Vehicle Regulatory Fees” means any mandatory fees collected or assessed by the State of California and any of its counties, cities, or political subdivisions when a vehicle is purchased, leased, sold, titled, or registered.

If you are still not sure whether you are included, you can get free help. You can call the Settlement Administrator toll-free at 1-877-879-5074; send an email to info@SpielmanSettlement.com; or visit the Website, SpielmanSettlement.com for more information. You may also contact any of the Class Counsel listed in Question 18 below. You are not required to pay anyone to assist you in obtaining information about or a payment from the Settlement.

7. I'm still not sure if I am included.

If you are still not sure whether you are included, you can get free help. You can call the Settlement Administrator toll-free at 1-877-879-5074; send an email to info@SpielmanSettlement.com; or visit the Website, SpielmanSettlement.com for more information. You may also contact any of the Class Counsel listed in Question 18 below. You are not required to pay anyone to assist you in obtaining information about or a payment from the Settlement.

THE SETTLEMENT BENEFITS—WHAT YOU GET

8. What does the proposed Settlement provide?

There will be a \$3.05 million (\$3,050,000) Settlement Fund. Current Policyholders will be eligible for a payment based on their pro rata share of the Settlement Fund after payment has been made for attorneys' fees and expenses, any Class Representative Service Award, and the costs of notice and settlement administration.

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(See Question 9 for an explanation of those terms and Question 19 for an explanation of the amounts Plaintiff proposes for attorneys' fees and expenses, the Service Award, and the costs of notice and settlement administration.) Former Policyholders are eligible for a payment if they return an Address Verification Form. (See Question 9 for more information.) A Class Member's pro rata share will be calculated based on the value of the Class Member's leased vehicle at the time of the Total Loss (as reflected in the USAA Entities' records) and reduced by any amounts already paid for Sales Tax and/or Vehicle Regulatory Fees.

In addition, the Settlement provides that the USAA Entities agree to pay applicable Sales Tax and Title and Registration Fees on total loss vehicles in California without regard to whether the vehicle is leased or owned. In other words, leased vehicles will be treated as owned vehicles for purposes of the payment of these taxes and fees on total loss vehicles. The USAA Entities reserve the right to change their practices in the event of a change in California law, a change in the State of California's taxes or fees charged incidental to the transfer of ownership of motor vehicles titled and/or registered in California, or other changes in taxes and fees, or appropriate changes in the terms of the applicable insurance policies.

If the Settlement becomes final, the lawsuit will be dismissed with prejudice, and the USAA companies will receive a complete release and discharge of the claims asserted in the lawsuit. (See Question 14 below for more details.)

9. Who is a "Current Policyholder"? Who is a "Former Policyholder"? What do they need to do to participate in the Settlement?

A "Current Policyholder" is Settlement Class Member who, as of September 28, 2022, is a policyholder under a California Automobile Insurance Policy issued by one of the USAA companies. A "Former Policyholder" is a Settlement Class Member who, as of September 28, 2022, is not a Policyholder under a California Automobile Insurance Policy issued by one of the USAA companies. There is no difference in the amount of the Settlement payments for Current Policyholders and Former Policyholders or in how those payments are calculated. The only difference is what the Settlement Class Member needs to do to receive a payment under this Settlement.

The USAA Entities' records identified who is a Current Policyholder and who is a Former Policyholder.

A **Current Policyholder** does not need to do anything to be eligible to get a payment under the Settlement. If you are a Current Policyholder, you were not sent an Address Verification Form with this Notice, and you should not attempt to submit that Form.

If you are a **Former Policyholder**, you received an Address Verification Form with this Notice. To get a payment under the Settlement, you must submit an Address Verification Form by **January 27, 2023**. There are two ways to submit the Address Verification Form: (1) mail it to the Settlement Administrator at the address in Question 15 so that it is *postmarked* by January 27, 2023, or (2) submit your form online at the Website, SpielmanSettlement.com, by January 27, 2023. If you do not submit an Address Verification Form by January 27, 2023, you will not be eligible to receive a payment.

10. How much will my payment be?

At this time we don't know what your individual payment will be. Payments will be calculated as set forth in Question 8 above. We will know more when the amounts by which the Settlement Fund are reduced by the payment of fees and expenses, and the number of qualifying Class Members, are determined.

HOW YOU GET A PAYMENT

11. How can I get a payment?

Current Policyholders who do not exclude themselves from the Settlement will receive their payments without having to do anything more. Former Policyholders must submit a timely Address Verification Form to be eligible to receive a payment. (See Question 9 for more details.)

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12. What is a “Legally Authorized Representative”?

A “Legally Authorized Representative” means an administrator/administratrix, personal representative, or executor/executrix of a deceased Class Member’s estate; a guardian, conservator, or next friend of an incapacitated Class Member; or any other legally appointed person or entity responsible for handling the business affairs of a Class Member. A Legally Authorized Representative of a Class Member can, for example, submit an Address Verification Form (see Question 9 above), an exclusion request (see Questions 15-17 below), or an objection (see Questions 20-21 below) on behalf of the Class Member.

13. When will I get my payment?

The exact date that qualifying Class Members will receive payment is not known at this time. Payments will be made after the Court grants “final approval” of the Settlement and any appeals are resolved.

The Court will hold a hearing on **February 27, 2023, at 10:00 a.m. (Pacific time)** to decide whether to approve the Settlement. If the Court approves the Settlement (see the section “The Court’s Final Approval Hearing,” below), there may be appeals. It’s always uncertain whether these appeals can be resolved, and resolving them can take time. Please be patient. Please check the Website, SpielmanSettlement.com, for updates and other important information about the Settlement, or call 1-877-879-5074 toll-free or send an email to info@SpielmanSettlement.com to learn the status of the Settlement.

14. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself from the Settlement, you are staying in the Class, and that means that you can’t sue or be part of any other lawsuit against the USAA companies about the legal issues in this case. It also means that all of the Court’s orders will apply to you and legally bind you.

If you stay in the Class, you will agree to “release and discharge” the USAA companies and the “Released Persons” from all “Released Claims,” as described in Paragraphs 43-47 of the Settlement Agreement. You can get a copy of the Settlement Agreement on the Website or by contacting the Settlement Administrator.

The Settlement Agreement specifically describes the Released Claims in legal terminology. Talk to Class Counsel (see the section on “The Lawyers Representing You”) or your own lawyer if you have questions about the Released Claims or what they mean.

EXCLUDING YOURSELF (“OPTING OUT”) FROM THE SETTLEMENT

If you don’t want a payment from the Settlement, and instead you want to keep the right to sue the USAA companies on your own about the legal issues in the case, then you must take steps to get out of the Settlement. This is called excluding yourself—or is sometimes referred to as “opting out” of the Class.

15. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail a letter to the Settlement Administrator with a clear statement that you want to be excluded from the *Spielman v. USAA* Settlement.

Be sure to include your name, address, and signature. If you are sending the request to be excluded as the Legally Authorized Representative of a Class Member (see Question 12 above for the definition of that term), you must include any information or documents that confirm your appointment or status as a Legally Authorized Representative. Requests for exclusion must be submitted individually by a Class Member or his or her Legally Authorized Representative, and not on behalf of a group or class of persons. If you have a personal lawyer, your lawyer may assist you with your exclusion request, but you must sign the exclusion request, unless the lawyer is also your Legally Authorized Representative.

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You must mail your exclusion request **postmarked no later than January 27, 2023**, to the following address:

Spielman v USAA Settlement Administrator
Exclusion Request
P.O. Box 6330
Portland, OR 97228-6330

You can't exclude yourself on the phone, by email, or on the Website. If you ask to be excluded, you will not get any money from the Settlement, and you cannot object to the Settlement or intervene in the case. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) the USAA companies. If you have a pending lawsuit against the USAA companies involving the same legal issues in the Settlement, speak to your lawyer in that case immediately.

16. If I don't exclude myself, can I sue the USAA companies for the same thing later?

No. Unless you exclude yourself from the Settlement, you give up any right to sue the USAA companies for the claims that are resolved by Settlement. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

Remember, the exclusion deadline is **January 27, 2023**.

17. If I exclude myself, can I get a payment from the Settlement?

No. If you exclude yourself, you will not be able to get any money from the Settlement, and you cannot object to the Settlement. You will not be legally bound by anything that happens in the Settlement.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court has appointed the following law firms and attorneys to represent you and other Class Members in the Settlement:

Annick Persinger
Glenn E. Chappell
TYCKO & ZAVAREEI LLP
10880 Wilshire Blvd., Suite 1101
Los Angeles, CA 90024
Telephone: (213) 425-3657
Email: apersinger@tzlegal.com
gchappell@tzlegal.com

Jason H. Alperstein
**KOPELOWITZ OSTROW
FERGUSON WEISELBERG GILBERT**
One West Las Olas, Suite 500
Fort Lauderdale, FL 33301
Telephone: (954) 525-4100
Email: alperstein@kolawyers.com

Scott Edelsberg
EDELSBERG LAW, PA
20900 NE 30th Ave., Suite 417
Aventura, FL 33180
Telephone: (305) 975-3320
Email: scott@edelsberglaw.com

Andrew J. Shamis
SHAMIS & GENTILE, P.A
14 NE 1st Avenue, Suite 400
Miami, FL 33132
Telephone: (305) 479-2299
Email: ashamis@shamisgentile.com

These lawyers are called Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid? What is the Class Representative's Service Award?

Class Counsel will ask the Court to approve a payment of up to \$1,016,565 for attorneys' fees, plus reimbursement of up to \$30,000 in out-of-pocket costs. If the Court approves those payments, they will be paid out of the \$3.05 million Settlement Fund. Class Counsel will also ask for a payment of up to \$5,000 to Lester Spielman for

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his services as Class Representative (the “Class Representative Service Award”) to be paid from the Settlement Fund. The Court may award less than these amounts. The Court will also decide how much to deduct from the Settlement Fund for notice and settlement administration costs; currently, Class Counsel estimate that the maximum amount of notice and settlement administration will be approximately \$80,000, but the Court will need to finally approve the amount. Class Counsel will file papers seeking awards of these fees and expenses by December 12, 2022.

OBJECTING TO THE SETTLEMENT

If you are a Class Member and do not exclude yourself, you can tell the Court that you don’t agree with the Settlement or some part of it. You can’t ask the Court for 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. If that is what you want to happen, you must object.

20. How do I tell the Court that I don’t like the Settlement?

If you’re a Class Member (or a Class Member’s Legally Authorized Representative), you can object to the Settlement if you don’t like it, or you may try to intervene in the case. However, you cannot object if you have excluded yourself from the Settlement. In other words, you must stay in the case as a Class Member in order to object to or intervene in the Settlement.

You can object if you don’t like any part of the proposed Settlement, including but not limited to the payments to Class Members, the request for the Attorneys’ Fees and Expenses Award, the request for Service Award to the Class Representative, or any other part of the Settlement. You can give reasons why you think the Court should not approve any or all of these items. The Court will consider your views if you comply with the requirements for objecting.

To object, you must (a) **mail** your objection to the Settlement Administrator **and** (b) **file** it with the Court. To be timely, your objection must be mailed to the Settlement Administrator so that it is **postmarked by January 27, 2023**, and must be **filed** with the Court by no later than **January 27, 2023**, at the following addresses:

Address of Settlement Administrator:

Spielman v USAA Settlement Administrator
Attn: Objections
P.O. Box 6330
Portland, OR 97228-6330

Address of Court:

United States District Court
Central District of California
Re: Spielman v. USAA, No 2:19-cv-01359
350 W 1st Street, Suite 4311
Los Angeles, CA 90012-4565

Note: You may mail your objection to the Court, but it must be **received** by the Court **and filed** by January 27, 2023. See SpielmanSettlement.com for more information on how to object to or intervene in the Settlement. You may also file your objection at the courthouse or submit your objection electronically on the Court’s docket via “PACER” (see Question 26 below).

Your objection should (a) contain a heading which includes the name of the case and case number (*Spielman v. United Services Automobile Association et al.*, Case No. 2:19-cv-01359); (b) provide your full name, address, telephone number, and signature; (c) indicate the specific reasons why you object to the Settlement; (d) contain the name, address, bar number, and telephone number of your counsel, if you’re represented by an attorney; if you are represented by an attorney, he or she must comply with all applicable laws and rules for filing documents; (e) provide a list of other cases in which you or your counsel has appeared either as an objector or counsel for an objector in the last five years; and (f) state whether you intend to appear at the Final Approval Hearing, either in person or through counsel. All objections must be signed by the objecting Class Member (or his or her Legally Authorized Representative), even if the Class Member is represented by counsel.

If you intend to appear at the Final Approval Hearing to object to the Settlement, you must also provide with your written objection a detailed statement of the specific legal and factual basis for each objection, a list of any witnesses you will call at the Hearing with each witness’ address and summary of the witness’ testimony, a description of all evidence you will offer at the Hearing with copies of the exhibits attached, and documentary proof of your membership in the Class. You or your lawyer may appear at the Final Approval Hearing if you have filed a

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written objection as provided above. (See the section on “The Court’s Final Approval Hearing” below.) If you have a lawyer file an objection for you, he or she must follow all rules, and you must list the attorney’s name, address, bar number, and telephone number in the written objection filed with the Court.

If you want to intervene as a party to the case, you must file a motion to intervene with the Court by January 27, 2023, so that the Parties can respond to the motion.

Please note that any objections or motions must be submitted by an individual Class Member or his, her, or its attorney, not as a member of a group, class, or subclass. The only exception is that an objection may be submitted on behalf of a Class Member by the Legally Authorized Representative (see Question 12 above for a definition of that term).

21. What’s the difference between objecting and excluding yourself?

Objecting is simply telling the Court that you don’t like something about the Settlement. You can object to the Settlement only if you stay in the Settlement. Excluding yourself is telling the Court that you don’t want to be part of the Settlement. If you exclude yourself, you have no basis to object, because the case no longer affects you. If you object, and the Court approves the Settlement anyway, you will still be legally bound by the result.

THE COURT’S FINAL APPROVAL HEARING

The Court will hold a hearing called a “Final Approval Hearing” (also known as a “Fairness Hearing”) to decide whether to approve the Settlement. If you haven’t excluded yourself from the Settlement, you may attend the Final Approval Hearing and may ask to speak to the Court, but you don’t have to.

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing to decide whether to finally approve the proposed Settlement. You may attend and you may ask to speak, but you don’t have to do either one.

The Final Approval Hearing will be on **February 27, 2023, at 10:00 a.m. (Pacific time)** before Judge Terry J. Hatter, Jr. PLEASE NOTE that the Court may conduct the Final Approval Hearing by video conference. Please check the Website, the Court’s PACER website, or call the Settlement Administrator for current information. Also, the Final Approval Hearing may be moved to a different date or time without additional notice, so you should check the Website, the Court’s PACER website, or call the Settlement Administrator before making travel plans.

At the Hearing, the Court will consider whether the proposed Settlement and all of its terms are adequate, fair, and reasonable. If there are objections, the Court will consider them. The Court may listen to people who have asked for permission to speak at the Hearing. The Court may also decide how much to award Class Counsel for fees and expenses for representing the Class (the Attorneys’ Fees and Expense Awards) and whether and how much to award the Class Representative for representing the Class (the Service Awards).

At or after the Final Approval Hearing, the Court will decide whether to finally approve the proposed Settlement. There may be appeals after that. There is no set timeline for either the Court’s final approval decision, or for any appeals that may be brought from that decision, so it is impossible to know exactly when the Settlement will become final.

The Court may change deadlines listed in this Notice without further notice to the Class. To keep up on any changes in the deadlines, please contact the Settlement Administrator, the Website, or the Court’s docket via PACER.

23. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions asked by the Court. But you are welcome to come at your own expense. If you intend to have a lawyer appear on your behalf at the Final Approval Hearing, your lawyer must enter a written notice of appearance of counsel with the Clerk of the Court no later than January 27, 2023, and you must comply with all of the requirements explained in Question 20 above.

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If you send an objection, you don't have to come to Court to talk about it. So long as you mailed your written objection on time and complied with the other requirements for a proper objection, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

24. May I speak at the Final Approval Hearing?

Yes. If you submitted a proper written objection to the Settlement, you or your lawyer acting on your behalf may speak at the Final Approval Hearing. To do so, you must send a Notice of Intention to Appear and follow the procedures set out in Question 20 above. Your Notice of Intention to Appear must be mailed to the Settlement Administrator so that it is **postmarked no later than January 27, 2023**, and it must be **filed** with the Clerk of the Court by that same date. (See Question 20 above for the addresses of the Settlement Administrator and the Court.) You cannot speak at the Final Approval Hearing if you excluded yourself.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

Unless you exclude yourself, you will be part of the Class and this Settlement, and you won't be able to sue, continue to sue, or be part of any other lawsuit against Defendants about the legal issues in this case, ever again.

If you are a Current Policyholder, and you do not exclude yourself, you do not have to do anything to receive a payment. You will receive a payment automatically. (See Question 9 for more details.)

If you are a Former Policyholder, and you do not exclude yourself, you'll get no money from this Settlement unless you send an Address Verification Form, as explained in Question 9.

GETTING MORE INFORMATION

26. 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 SpielmanSettlement.com; the Website also contains additional information about the Settlement. You may also get information by contacting the Settlement Administrator as noted below; by contacting Class Counsel (see Question 18); by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system available at <https://ecf.cacd.uscourts.gov/cgi-bin/ShowIndex.pl>; or by visiting the office of the Clerk of the Court, as noted below.

- Class Counsel: See Question 18 for contact information.
- Settlement Administrator: Call toll-free at 1-877-879-5074; email at info@SpielmanSettlement.com; or write to the Settlement Administrator at the address listed in Question 20.
- Clerk of the Court: You may review legal documents that have been filed with the Clerk of Court at the address noted in Question 20 during regular office hours. Please note that due to the COVID-19 pandemic, you may need to make other arrangements to view court documents. Please contact the Clerk's Office for information on accessing court documents, but the Clerk will NOT answer questions about the Settlement.

PLEASE DO NOT CALL THE JUDGE OR THE COURT CLERK TO ASK QUESTIONS ABOUT THE LAWSUIT, THE SETTLEMENT, OR THIS NOTICE.

THE COURT WILL NOT RESPOND TO LETTERS OR TELEPHONE CALLS. IF YOU WISH TO ADDRESS THE COURT, YOU MUST FILE AN APPROPRIATE PLEADING OR MOTION WITH THE CLERK OF THE COURT IN ACCORDANCE WITH THE COURT'S USUAL PROCEDURES.

PLEASE DO NOT CONTACT USAA ABOUT THIS SETTLEMENT.

QUESTIONS? CALL 1-877-879-5074 TOLL-FREE, OR VISIT SpielmanSettlement.com.
PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR 1-877-879-5074, O VISITAR SpielmanSettlement.com.
