



United States District Court for the District of Maryland

*Black et al. v. USAA General Indemnity Company et al.*

Case No. 8:21-cv-01581-LKG

# Class Action Notice

**Authorized by the U.S. District Court for the District Court of Maryland**

**Did USAA refund  
you Late Fees  
without interest  
and/or gains in  
connection with  
a Maryland  
insurance  
policy?**

**You may get  
money in a  
\$5 million  
class action  
settlement.**

**No action required  
to be a part of this  
settlement.**

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If you are a Settlement Class Member and take no action, you will automatically receive a payment and be bound by the settlement, and your rights will be affected. Learn more at: [www.USAALateFeeLitigation.com](http://www.USAALateFeeLitigation.com).

- This settlement resolves a lawsuit over whether the Defendants should have paid interest and/or monetary gains in connection with the late fees it refunded to Settlement Class Members.
- The Defendants deny that they did anything wrong or owe anyone money.
- The exact amount each Settlement Class Member will get (in the form of a statement credit or a check) depends on a number of factors, including the number of late fees each Settlement Class Member was charged, and the date that the fees were refunded, as well as the number of Class Members who opt out from the settlement (if any).

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# About This Notice

## Why was this notice issued and am I affected?

This notice was issued to tell you about the settlement that was reached in a class action lawsuit called *Black et al. v. USAA General Indemnity Company et al.* The lawsuit was brought on behalf of a Settlement Class. You are a Settlement Class Member if you meet the following criteria:

- ✓ You were charged a late fee by USAA General Indemnity Company, Garrison Property and Casualty Insurance Company, United Services Automobile Association, or USAA Casualty Insurance Company (collectively, "USAA Defendants") on a Maryland insurance policy prior to 2020;
- ✓ You received a refund for those late fee charge(s) pursuant to Maryland Consent Order MIA-2020-08-002;
- ✓ You did **not** receive accrued interest and/or gains on the late fee refund(s).

**Settlement Class Members have the right to know about the Settlement and their rights and options before the Court decides the outcome.**

## What do I do next?

Read this notice to understand the settlement and to determine if you are a Settlement Class Member. Then, decide if you want to:

Options	More information about each option
<b>Do Nothing and Remain in the Settlement Class</b>	Get an automatic payment either in the form of a statement credit (for Current Policyholders) or in the form of a mailed check (for Former Policyholders). Be bound by the settlement.
<b>Opt Out of the Settlement</b>	Get no payment. This is the only option that allows you to bring another lawsuit against the USAA Defendants about the same issues that the settlement resolves.
<b>Object and Remain in the Settlement Class</b>	Tell the Court why you don't like the settlement. Still get an automatic payment and be bound by the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

## What are the most important dates?

Deadline to object or opt out: **March 30, 2026**

Settlement approval hearing: **April 28, 2026**

# Learning About the Lawsuit

## What is this lawsuit about?

Following a market conduct examination by the Maryland Insurance Commissioner, the USAA Defendants entered into a Consent Order with the MIA regarding the USAA Defendants' assessment of certain late fees against policyholders with insured risks in Maryland. In connection with the Consent Order, USAA Defendants refunded the principal amount of the late fees to affected policyholders, but they did **not** include any interest and/or gains that they made on the late fees. Plaintiffs allege that they, and others similarly situated, should have received such monies in addition to the refund of the principal amount of the late fee(s).

The USAA Defendants deny that they did anything wrong or owe anyone money.

## Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:

[www.USAALateFeeLitigation.com](http://www.USAALateFeeLitigation.com)

## Why is there a settlement in this lawsuit?

In September 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The settlement is on behalf of the policyholders who brought the case and on behalf of the Settlement Class. The Court has not decided this case in favor of either side.

### What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

## What happens next in this lawsuit?

The Court will hold a Final Approval hearing to decide whether to approve the settlement. The hearing will be held at:

**Where:** 6500 Cherrywood Lane, Suite 400, Greenbelt, MD 20770.

**When:** 10:00 a.m. on April 28, 2026.

The Court has directed the parties to provide this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to [www.USAALateFeeLitigation.com](http://www.USAALateFeeLitigation.com).

# Learning About the Settlement

## What does the settlement provide?

The USAA Defendants have agreed to create a **\$5,000,000** Settlement Fund to be allocated among all Settlement Class Members who do not opt out of the settlement. This money will also be used to pay for costs and lawyer fees approved by the Court. The USAA Defendants are separately paying for the costs of administering this settlement. Settlement Class Members will “release” their claims as part of the settlement, which means they cannot sue USAA General Indemnity Company, Garrison Property and Casualty Insurance Company, United Services Automobile Association or USAA Casualty Insurance Company for the same issues and legal violations raised in this lawsuit. The full terms of the release can be found [here](#).

If there is money left over after the claims process is completed, it will be donated to Wounded Warrior Project and Face the Fight.

## How much will my payment be?

The exact amount of your payment will depend on how many late fees you were charged and how long ago you paid the late fee(s), as well as the total number of Settlement Class Members (less any who opt out of the settlement). Current USAA Policyholders will receive payment in the form of a statement credit, and Former USAA Policyholders will receive a mailed check. If you are still unsure if you are a Settlement Class Member, call 1-877-206-2306, visit [www.USAALateFeeLitigation.com](http://www.USAALateFeeLitigation.com), or email [info@USAALateFeeLitigation.com](mailto:info@USAALateFeeLitigation.com) to see if you are eligible.

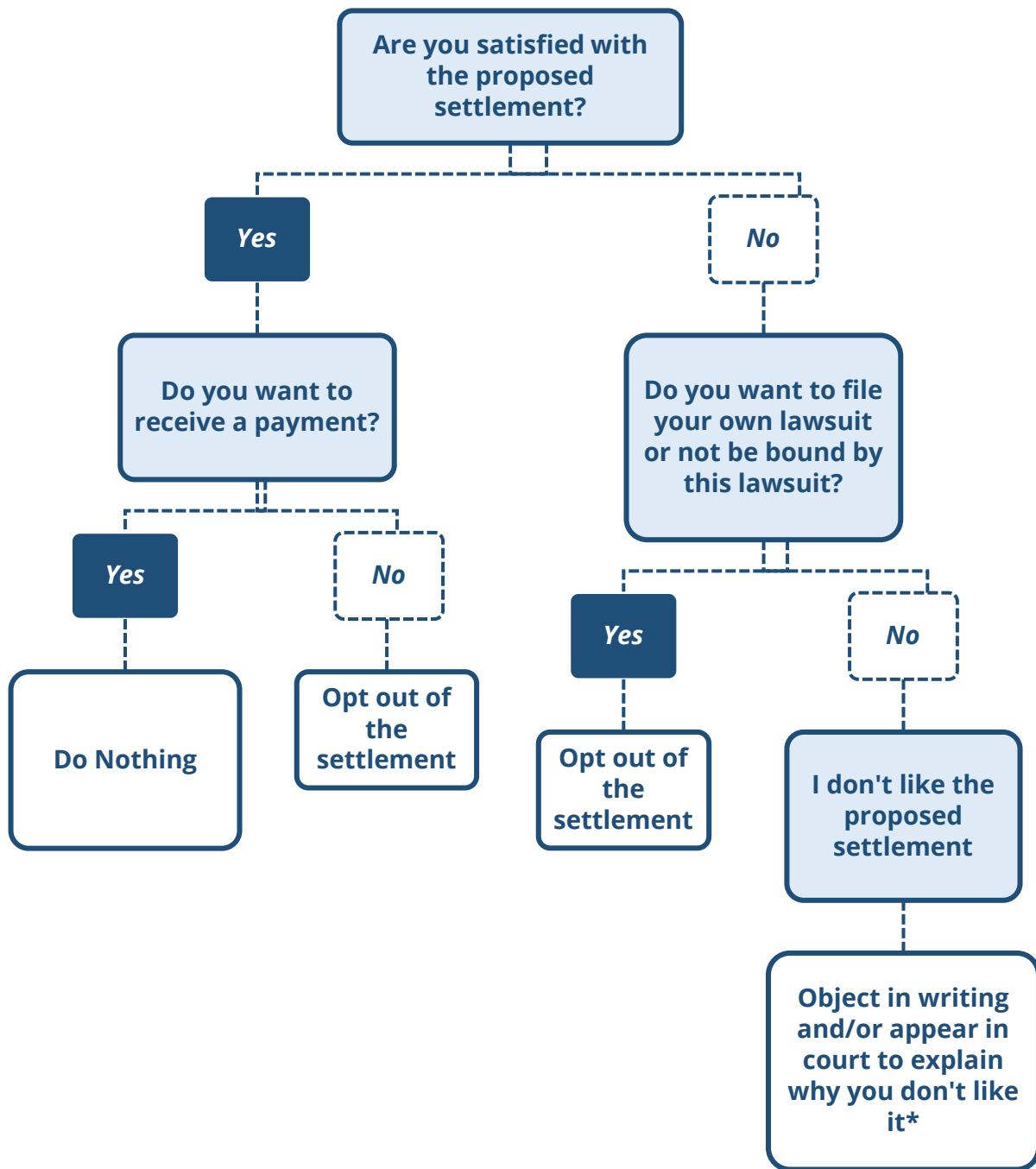
# Deciding What to Do

## How do I weigh my options?

You have three options: (1) you can do nothing; (2) you can opt out of the settlement; or (3) you can object to the settlement. This chart shows the effects of each option:

	Do Nothing	Opt Out	Object
<b>Can I receive settlement money if I ...</b>	YES	NO	YES
<b>Am I bound by the terms of this lawsuit if I ...</b>	YES	NO	YES
<b>Can I pursue my own lawsuit if I ...</b>	NO	YES	NO
<b>Will the class lawyers represent me if I ...</b>	YES	NO	NO

## What is the best path for me?



*\*If you object to the settlement you will remain in the Settlement Class and receive payment.*

# Participating as a Settlement Class Member

## How do I get a payment if I am a Settlement Class Member?

If you wish to get money, you do not need to do anything. For Current Policyholders, payments will be issued in the form of a statement credit, and for Former Policyholders, payments will be issued in the form of a check.

## Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following individuals and lawyers.

**Your Settlement Class Representatives:** Walter Black III, Keith Barr, Wayne Best, and David Fant Sr.

**Your lawyers:** Andrea R. Gold and Gemma Seidita of Tycko & Zavareei LLP; Jonathan Kagan of Kagan Stern Marinello & Beard LLC; and Keith T. Vernon and Andrew W. Knox of Timoney Knox, LLP. These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

## Do I have to pay the lawyers in this lawsuit?

**You will not have to pay the lawyers directly.** Lawyers' fees and costs will be paid from the Settlement Fund.

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this settlement, that the Court approve a payment of

up to \$2,000,000 total in attorneys' fees plus the reimbursement of out-of-pocket expenses.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$7,500 to Settlement Class Representative Walter Black III, and \$3,500 each for Settlement Class Representatives Keith Barr, Wayne Best, and David Fant, Sr. for the time and effort they contributed to the case. If approved by the Court, the Service Awards will be paid from the Settlement Fund.

## Opting Out

### What if I don't want to be part of this settlement?

You can opt out. If you do, you will not get a payment and you cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit. That means you keep the right to sue USAA General Indemnity Company, Garrison Property and Casualty Insurance Company, United Services Automobile Association or USAA Casualty Insurance Company or be part of another case against them about the issues in this lawsuit. **If you have a pending lawsuit against USAA General Indemnity Company, Garrison Property and Casualty Insurance Company, United Services Automobile Association or USAA Casualty Insurance Company that asserts claims similar to the ones in this class action, speak to your lawyer in that case immediately.** You must exclude yourself from the Settlement Class to continue your own lawsuit. This settlement will not impact any pending lawsuit against USAA Defendants concerning any insurance claims.

### How do I opt out?

To opt out of the settlement, you must send a written request to opt out to the Settlement Administrator by U.S. Mail or private courier, postmarked no later than **March 30, 2026**, the last day of the Opt Out Period. The written opt out request must include the following

information:

- (1) your name, address, email address (if any), telephone number;
- (2) the last four digits of the applicable policy number(s) or former policy number(s) for your policies with the USAA Defendants;
- (3) a brief statement identifying your membership in the Settlement Class;
- (4) a statement indicating your desire to be excluded from the Settlement Class; and
- (5) your personal signature

You must personally sign your opt out request, and any person who opts out must do so on their own, no “mass” or “class” opt outs are permitted.

Opt Out Requests must be mailed by **March 30, 2026** to the Settlement Administrator at:

Black v. USAA  
c/o JND Legal Administration  
PO Box 91109  
Seattle, WA 98111

## Objecting

### What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement—it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must file or send a letter to the Court and to the Settlement Administrator by **March 30, 2026** that includes:

- (1) the case name and number (*Black et al. v. USAA General Indemnity Company et al.*, No. 8:21-CV-01581-LKG);

(2) your full name, address and telephone number, the last four digits of the applicable policy number(s) or former policy number(s) for your policies with the USAA Defendants, and email address (if you have one);

(3) a statement of the reasons for your objection, including any legal support known to you or your lawyer (if you have one);

(4) a statement of the number of times you have objected to a class action settlement within the past five years from the date of your objection, including the caption of each case in which you have made an objection, and a copy of any orders related to or ruling on your prior objections in each listed case;

(5) a statement of whether you have a lawyer, and the identity of that lawyer (including any former or current lawyers who may be entitled to compensation for any reason related to your objection to the settlement);

(6) a statement of the number of times your lawyer(s) and/or their law firm(s) have objected to a class action settlement within the past five years from the date of your objection, including the caption of each case in which they have made an objection, and a copy of any orders related to or ruling on their prior objections in each listed case;

(7) any agreements relating to the objection or the process of objecting to this proposed Settlement, whether written or oral, between you and your attorney(s) or any other person or entity;

(8) a statement of whether you or your lawyer intend to appear at the final approval hearing, and if you or your lawyer are attending, a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection; and

(9) your signature (signature from your attorneys is insufficient).

Mail the letter to:

Black v. USAA  
c/o JND Legal Administration  
PO Box 91109  
Seattle, WA 98111  
1-877-206-2306

U.S. District Court for the District of Maryland – Greenbelt Division  
6500 Cherrywood Lane  
Greenbelt, MD 20770

# Key Resources

## How do I get more information?

This notice is a summary of the proposed settlement. To get a copy of the settlement agreement or answers to your questions, you may use any of the resources below:

Resource	Contact Information
<b>Case website</b>	<a href="http://www.USAALateFeeLitigation.com">www.USAALateFeeLitigation.com</a>
<b>Settlement Administrator</b>	Black v. USAA c/o JND Legal Administration PO Box 91109 Seattle, WA 98111
<b>Your Lawyers (Settlement Class Counsel)</b>	Tycko & Zavareei LLP <a href="mailto:agold@tzlegal.com">agold@tzlegal.com</a> ; <a href="mailto:gseidita@tzlegal.com">gseidita@tzlegal.com</a> 2000 Pennsylvania Avenue, Suite 1010 Washington, DC 20006  Kagan Stern Marinello & Beard LLC <a href="mailto:kagan@kaganstern.com">kagan@kaganstern.com</a> 238 West Street Annapolis, MD 21401  Timoney Knox LLP <a href="mailto:kvernon@timoneyknox.com">kvernon@timoneyknox.com</a> ; 1717 K Street NW, Suite 900 Washington, DC 20006  Timoney Knox LLP <a href="mailto:aknox@timoneyknox.com">aknox@timoneyknox.com</a> 400 Maryland Drive Fort Washington, PA 19034
<b>Court's PACER System</b> <b>Do Not Contact the Court</b>	Access at: U.S. District Court for the District of Maryland – Greenbelt Division 6500 Cherrywood Lane Greenbelt, MD 20770 <a href="https://ecf.mdd.uscourts.gov/">https://ecf.mdd.uscourts.gov/</a>