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Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

WILLIAM F. WREN and JOHN MURPHY, on behalf of themselves and others similarly situated,

Plaintiffs,

v.

TRANSAMERICA LIFE INSURANCE COMPANY,

Defendant.

Case No. 5:21-cv-00178-JGB-SP

DECLARATION OF STEVEN G. SKLAVER IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR CERTIFICATION OF SETTLEMENT CLASS AND FINAL APPROVAL OF CLASS ACTION SETTLEMENT

I, Steven G. Sklaver, hereby declare as follows:

1. I submit this declaration in support of Plaintiffs' motion for final approval of the proposed class action settlement between (i) William F. Wren and John Murphy, individually and on behalf of the Class; and (ii) Defendant Transamerica Life Insurance Company ("Transamerica").

2. I am a member in good standing of California. I am a partner of the law firm of Susman Godfrey L.L.P., and counsel of record for Plaintiffs in the above-captioned action. I have personal knowledge of the facts set forth herein and, if called to testify as a witness, could and would testify competently thereto.

3. Susman Godfrey has significant experience with insurance litigation and class actions, including life-insurance actions and settlements of those cases. A copy of Susman Godfrey's class action profile and my profile along with the profiles of the other counsel of record for Plaintiff are attached hereto as **Exhibit 1**. My co-counsel in this action, Bonnett Fairbourn Friedman & Balint ("BFFB"), also has significant experience with insurance litigation and class actions. A copy of BFFB's firm profile, as well as the personal profiles of Andrew Friedman and Francis Balint, are attached hereto as **Exhibit 2**.

4. I was among the principal negotiators of the proposed class action settlement (the "Settlement"). Following extensive negotiations, the parties reached a proposed agreement on January 12, 2026, and the parties then negotiated a long-form Settlement Agreement, a true and correct copy of which is attached as **Exhibit 3**. A true and correct copy of the Plan of Allocation is attached as **Exhibit 4**. It is Class Counsel's opinion that this settlement is fair, adequate, and reasonable.

5. My colleague Zachary Savage submitted a declaration in support of Plaintiffs' Motion for Preliminary Approval. Dkt. 207-2. I also submitted a declaration in support of Class Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Service Awards ("Fee Motion"). Dkt. 212-2. I submit this additional declaration to update the Court on developments

following that declaration, including after the close of the class objection and opt-out period on October 2, 2026.

THE LITIGATION

6. In February 2021, Plaintiff William Wren filed this putative class action lawsuit against Transamerica, asserting various claims including for breach of contract based on Transamerica's failure to pay Cash Value Increases ("CVIs") on Plaintiff's and other similarly situated policyholders' life insurance policies. Plaintiff owned policies known as "Direct Recognition Life" policies, under which Transamerica had promised to pay CVIs for various policy anniversaries, including the 20th, 30th, and 40th years, when Transamerica would increase the policies' cash values. *See* Dkt. 1. But in 2016, Transamerica notified policyholders that it would not pay the 30- and 40-year CVIs, based on Transamerica's interpretation of the previous class-action settlement in *Oakes v. Bankers United Life Assurance Co.*, No. 96-06849 (192nd Dist. Ct. Dallas Cnty. Tex.) ("*Oakes*"). *See*, *e.g.*, Exhibit 5 to the Declaration of Zachary B. Savage in Support of Plaintiffs' Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, Dkt. Dkt. 207-7. The *Oakes* settlement stated that it released insurance companies, including Transamerica's predecessor-in-interest, from "any and all causes of action" "relating to" the "performance" of "the Policies," including "the amount that would be realized or paid under the Policies … in the form of cash value[s]." Dkt. 90, at 4-5.

7. Transamerica filed a motion to dismiss one of the claims, Dkt. 22, which the Court denied, Dkt. 30. Transamerica subsequently served its Answer. *See* Dkt. 31.

8. In January 2022, after limited discovery, the parties filed cross-motions for summary judgment. *See* Dkt. 46 (Plaintiff's motion); Dkt. 51 (Transamerica's motion). On November 9, 2022, the Court granted Transamerica's motion for summary judgment and denied Plaintiff's motion. Dkt. 90. The Court held that the

Oakes settlement "bar[red]" Plaintiff from "enforc[ing] the performance of his Policy," *id.* at 9-10 (emphasis omitted), and the Court entered final judgment the same day, *see* Dkt. 91.

9. On November 30, 2022, Plaintiff filed a notice of appeal to the Ninth Circuit. My colleague Mr. Savage took the lead in drafting and filing both the opening brief and the reply brief for the appeal, *see Wren v. Transamerica Life Ins. Co.*, No. 22-56131 (9th Cir. July 20, 2023), Dkt. 24; *Wren*, No. 22-56131 (9th Cir. Nov. 13, 2023), Dkt. 39, and filed a citation of supplemental authorities after briefing had concluded, *see Wren*, No. 22-56131 (9th Cir. Jan. 17, 2024), Dkt. 45. Mr. Savage then argued the appeal on February 12, 2024.[1]

10. Less than one month later, on March 7, 2024, the Ninth Circuit unanimously reversed this Court's judgment. *Wren v. Transamerica Life Ins. Co.*, 2024 WL 977685 (9th Cir. Mar. 7, 2024). The court of appeals held that Plaintiff's "current claims could not have been raised at the time of the prior class action suit," so they are "not barred" by the *Oakes* settlement. *Id.* at *1. That settlement, the court explained, concerned claims that insurers had "fraudulently induced class members to purchase policies" with promises of large CVIs—where Plaintiff here sought to "litigate claims that [Transamerica] had refused" to credit CVIs. *Id.* Therefore, Plaintiff's claims were "not ripe at the time of the prior class action." *Id.*; *see also id.* at *2 (noting that Plaintiff's claims were "distinct from those asserted in the original class action"). The Ninth Circuit thus remanded the case to this Court "for further proceedings," allowing the claims to move forward. *Id.*

11. After the Ninth Circuit issued its mandate on March 29, 2024, I entered my appearance in this Court as counsel of record for Plaintiff, alongside several of my colleagues from Susman Godfrey. *See* Dkts. 97-101; *see also* Ex. 1 (profiles of

[1] A docket entry states that the case was "submitted on the briefs," but that is incorrect. *Wren*, No. 22-56131 (9th Cir. Feb. 12, 2024), Dkt. 47. Mr. Savage presented oral argument on February 12, 2024, a video of which is available on the Ninth Circuit's website at the following link: https://www.youtube.com/watch?v=DCdHRTJzLwY.

various Susman Godfrey attorneys). In June 2024, the Court entered a new case scheduling order, with fact discovery set to close on June 30, 2025. Dkt. 105. On June 10, 2025, the Court extended the fact discovery cutoff to September 30, 2025. Dkt. 144.

12. From April 2024 through September 2025, the parties engaged in extensive fact discovery, which Susman Godfrey supervised.

13. During the initial phases of fact discovery, Transamerica's document productions were inadequate. For example, on April 19, 2024, soon after the Ninth Circuit issued its mandate, Plaintiff served his Second Request for Production of Documents, First Set of Interrogatories, and requested that Transamerica supplement its responses to Plaintiff's First Request for Production of Documents. Yet nearly five months later, despite Plaintiff sending multiple discovery deficiency letters and engaging in numerous meet-and-confers, Transamerica had not produced a single document in response to those requests. Plaintiff therefore filed a motion to compel on September 20, 2024, seeking an order requiring Transamerica to complete its productions by a date certain. *See Wren v. Transamerica Life Ins. Co.*, 2024 WL 5317297 (C.D. Cal. Nov. 13, 2024); Dkt. 114, at 6-8; *see also* Dkts. 106, 107, 109 (first motion and supplements to motion). Magistrate Judge Pym granted that motion, and after several Court-ordered status updates, Transamerica increased its pace of document productions. *See* Dkts. 115, 117–18, 120.

14. Over the course of fact discovery, Plaintiffs served Transamerica with 102 requests for production, with Transamerica making 59 document productions, consisting of more than 2 million pages of documents, more than 1,800 Excel spreadsheets, and more than 580 audio files. Additionally, Plaintiffs served Transamerica with 34 requests for admission and 4 sets of interrogatories, totaling 15 interrogatories. Transamerica collectively provided 10 sets of responses to Plaintiffs' interrogatories—including by responding to each of the 4 sets and by providing 6 supplemental responses to some of those sets.

15. Susman Godfrey lawyers also deposed nine current and former Transamerica employees, and took a 30(b)(6) deposition on 19 topics (including more than 100 sub-topics) over three days, across three different individuals. Moreover, in advance of the 30(b)(6) deposition, Plaintiffs negotiated for and received a 24-page long written response to some of the 30(b)(6) topics.

16. Toward the close of fact discovery, Plaintiffs filed a second motion to compel. Because Transamerica had withheld as privileged certain internal documents concerning its interpretation of the *Oakes* settlement—while both selectively disclosing attorney-client communications concerning its interpretation of *Oakes*; and invoking what was "effectively an advice of counsel defense" concerning *Oakes*—Plaintiffs moved to compel production of Transamerica's *Oakes* documents. *Wren v. Transamerica Life Ins. Co.*, 2025 WL 3053026 (C.D. Cal. Sept. 26, 2025); Dkt. 167 at 5-6, 12; *see also* Dkts. 146, 147, 150, 151, 166 (second motion and supplements to motion). On September 26, 2025, Magistrate Judge Pym granted Plaintiffs' motion. Dkt. 167. She ordered Transamerica to either produce the withheld *Oakes* documents or withdraw its affirmative defense and agree that "it will not argue it relied in good faith on its interpretation of the *Oakes* settlement." Dkt. 167 at 13. That ruling was temporarily stayed to permit Transamerica to appeal to the District Court, Dkt. 173; and that stay remained in place while the parties stipulated to stay the case pending mediation on October 13, 2025, Dkt. 183. The ruling against Transamerica thus remained pending during the settlement negotiations.

17. Throughout the course of the more than five years of litigation, Mr. Wren and Mr. Murphy devoted significant time to reviewing pleadings and other substantive filings to advance the Class Members' interests—interests that have been continually aligned since this case was first filed. Both Plaintiffs also made significantly meaningful contributions to fact discovery. Mr. Wren responded to 61 requests for production, 19 interrogatories (including twice supplementing his responses), and reviewed his own files for responsive documents. Mr. Murphy

similarly responded to 21 requests for production, 7 interrogatories, and reviewed his files for responsive documents. In total, the two class representatives produced 776 pages of documents to Transamerica. Each class representative sat for a multi-hour deposition and spent many more hours, spread across several preparation sessions, preparing for the depositions, to advance the interests of the Class.

THE "WREN CREDITING PROJECT"

18. On May 27, 2025, during fact discovery, and following Plaintiff's favorable ruling from the Ninth Circuit, Transamerica's counsel informed Plaintiffs' counsel that it decided to reverse course for certain Class Members and was going to pay those Class Members their 30-year CVIs. Transamerica also informed Plaintiffs' counsel that it would pay those policyholders their 40-year CVIs, assuming the policies persisted to the 40-year anniversary. Plaintiffs later confirmed in discovery that Transamerica paid approximately $12.1 million in credits to those Class Members' accounts as part of this project—credits that Plaintiffs' expert has valued at $13.4 million. Those credits were paid directly, in full, to the Class Members' accounts. Plaintiffs' counsel has received no fees or expenses in connection with those amounts.

19. Soon after Transamerica told Plaintiffs' counsel about its intention to pay the credits, Plaintiffs' counsel moved for an order requiring Transamerica to reserve attorneys' fees and expenses from that common fund. Dkt. 135. Plaintiffs' counsel then withdrew that motion, in exchange for Transamerica's stipulation that, among other things, it would not contend that its payment of the credits in any way mooted a future request by Plaintiffs' counsel for attorneys' fees and expenses from any common benefit fund created by the credits, and that it would pay any such amounts of fees or expenses, if awarded by the Court, directly to Plaintiffs' counsel. Dkt. 143-1.

20. Plaintiffs confirmed in discovery that these payments were made entirely due to this litigation. Transamerica's internal documents referred to the

crediting project as the "*Wren* Crediting Project"—*i.e.*, explicitly named after this lawsuit. Those documents also stated that the project was undertaken as a "[p]roactive response to order of appellate court," and that Transamerica had decided to pay the credits "in light of an appellate court order that disagreed with [Transamerica's] prior rationale for not doing so." TLIC_WREN_02017508, 02017510 (a true and accurate copy of which is attached as Exhibit 7 to the Savage Declaration, Dkt. 207-9). Transamerica's Rule 30(b)(6) representative further testified that she could not think of "any other reasons why Transamerica decided to proceed with the crediting project" other than "the 9th Circuit's decision that Oakes did not release Transamerica from its obligations to pay cash value increases." Klau Tr. at 31:23-32:17 (a true and accurate copy of which is attached as Exhibit 8 to the Savage Declaration, Dkt. 207-10).

21. In June 2026, after the mediation in this case was complete and the parties were in the process of negotiating the final long-form settlement agreement, Transamerica informed Plaintiffs' counsel that it was going to pay an additional $2.6 million in cash value to 68 policyholders that it had inadvertently omitted from the crediting project, bringing the total credits paid under the project to approximately $14.6 million—which are worth, according to a preeminent expert in economics, Dkt. 207-12 (Declaration of Robert Mills), at ¶ 1, more than $16.2 million in cash because all premium load charges are waived and the credits are instead directly paid into each eligible class member's account value. Transamerica also informed Plaintiffs' counsel that it would pay those policyholders their 40-year CVIs, assuming the policies persisted to the 40-year anniversary.

MEDIATION AND SETTLEMENT

22. As stated above, I was one of the principal negotiators of the proposed class action Settlement. The Settlement is the result of extensive, arm's-length negotiations between the parties with the assistance of an experienced mediator, Robert Meyer, Esq., with JAMS.

23. In December 2021, the Court first referred the case to a mediator for alternative dispute resolution, *see* Dkt. 43, but initial settlement discussions were unsuccessful.

24. In mid-2025, after the Ninth Circuit's ruling and while this case was in the middle of fact discovery, the parties reached out to Mr. Meyer to schedule additional settlement discussions, to take place in the fall of 2025. The parties selected October 9, 2025 as the date for their first in-person mediation session with Mr. Meyer, to take place in Los Angeles, California.

25. In advance of the October 9, 2025 session, the parties prepared and submitted detailed mediation statements to Mr. Meyer. They exchanged certain portions of their mediation statements with each other, and I understand that Transamerica submitted a separate, confidential statement to Mr. Meyer as well.

26. The October 9, 2025 mediation session was held at JAMS' Century City office in Los Angeles, California. It was attended by multiple counsel for each party, including Transamerica's in-house counsel. It lasted all day and into the evening. Mr. Meyer engaged in separate discussions with Plaintiffs' counsel and Transamerica's counsel and facilitated the exchange of settlement demands and offers. The session concluded without the parties reaching any resolution.

27. At the conclusion of the October 9, 2025 session, the parties agreed to engage in a second in-person mediation session. The first date that was available for Mr. Meyer and for the parties for another mediation session was January 12, 2026, so we agreed to hold a second session on that date.

28. On January 12, 2026, the parties attended a second full-day mediation session at JAMS' Century City office in Los Angeles, California. Again, the mediation was attended by multiple counsel for each side, including Transamerica's in-house counsel.

29. During the January 12, 2026 mediation session, Mr. Meyer again conferred separately with Plaintiffs' counsel and Transamerica's counsel and

facilitated the exchange of further offers and demands. From time to time, the parties came together to discuss certain points that arose in the course of the discussions.

30. Ultimately, at the conclusion of the January 12, 2026 session, although no final settlement had been reached, progress had been made.

31. After the parties reached a tentative proposed settlement, subject to internal corporate approval within Transamerica, the parties negotiated, with Mr. Meyer's oversight, a proposed agreement that Transamerica would pay attorney's fees to resolve Plaintiffs' counsel's claim for attorneys' fees in connection with Transamerica's payment of credits to certain members of the class. At the request of Plaintiffs' counsel, the parties did not negotiate over attorneys' fees in connection with these payments before reaching agreement on the proposed consideration that the class members would receive.

32. Throughout the process, the Settlement negotiations were conducted by highly qualified and experienced counsel on both sides at arm's length. Plaintiffs' counsel was well informed of material facts, and the negotiations were hard-fought and non-collusive. Plaintiffs' counsel analyzed all of the contested legal and factual issues to thoroughly evaluate Transamerica's contentions, and advocated in the settlement negotiation process for a fair and reasonable settlement that serves the best interests of the Class. It is my opinion, as well as the opinion of all Plaintiffs' counsel, that this settlement is fair, adequate, and reasonable, especially in light of Plaintiffs' counsel's detailed assessment of the strengths and weaknesses of the claims asserted, the potential damages, and the likelihood of recovery.

PRELIMINARY APPROVAL, FEE MOTION, AND NOTICE

33. On July 10, 2026, Plaintiffs filed an unopposed Motion for Preliminary Approval of the Class Action Settlement ("Preliminary Approval Motion"), for which Mr. Savage submitted a similar declaration in support. Dkt. 207-2.

34. The Court granted preliminary approval of the Settlement on July 30, 2026. Dkt. 211.

35. On August 12, 2026, Transamerica paid the $110 million in cash into the non-reversionary Settlement Fund. Interest is posted to the account at the end of every calendar month. Because the interest rate paid on the Settlement Fund can change, the exact amount of additional interest to be earned in the future cannot be stated precisely, but is estimated to be approximately $994,261.77 through Nov. 9, 2026 and growing thereafter until distribution.

36. Following preliminary approval, the Settlement Administrator ("JND") disseminated notice to the Settlement Class in accordance with the procedures set forth in the Settlement Agreement and approved by the Court. JND has submitted a declaration regarding the notice disseminated following preliminary approval.

37. On August 18, 2026, JND mailed the Court-approved Class Notice via U.S. Postal Service mail to the 2,356 addresses provided by Transamerica as belonging to potential Settlement Class Members. *See* Declaration of Susan Waskiewicz ¶¶ 3–5. That same day, JND updated the Settlement website, www.WrenCVISettlement.com, with key information regarding the Settlement. *Id.* ¶ 7. JND also on August 18, 2026, activated the toll-free telephone line made available for further information about the Settlement. *Id.* ¶ 10.

38. The required Class Action Fairness Act Notice was sent by Transamerica to the U.S. Attorney General and applicable state officials on July 20, 2026. Transamerica has not received any objections to the Settlement from the U.S. Attorney General or state officials. Attached as Exhibit 5 is a declaration provided by Transamerica's counsel stating that Transamerica timely provided notice pursuant to the Class Action Fairness Act.

39. On September 18, 2026, Class Counsel filed its Fee Motion, which requested attorneys' fees in the amount of $47,455,027, plus a *pro rata* share of the interest earned on the settlement fund, reimbursement of $447,905.48 in litigation expenses, which includes within that amount reimbursement of administration expenses in the amount of $50,087.06, and a $25,000 service award for each of the

Plaintiffs. Dkt. 212-1. JND posted the Fee Motion and supporting documents on the Settlement website on the next business day, September 21, 2026. Waskiewicz Decl. ¶ 8. The mean net recovery, after deducting all requested fees, litigation expenses, administration costs, and service awards, if approved by the Court, would be $37,790, per Class Member.

40. Settlement proceeds will be mailed to Class Members within 60 days after the Final Settlement Date—that is, when the Court's judgment entered on the Final Approval Order becomes final. *See* Settlement Agreement ¶¶ 40, 133. Class Counsel prepared the Plan of Allocation with the assistance of Mr. Robert Mills, an expert economist with significant life insurance class action experience. Plaintiffs and eligible Class Members will receive a *pro rata* distribution of the settlement proceeds, with each Class Member receiving a $100 minimum distribution, except for those that receive their full unpaid CVI under the Bonus Crediting Project, with no requirement to submit any claim form or process. Payments will be mailed automatically, using the addresses in Transamerica's files as of the applicable date. Within one year plus 30 days after the date the Settlement Administrator mails the first checks, and to the extent feasible, any funds remaining will be re-distributed *pro rata* to Class Members who had previously cashed their checks.

THERE HAVE BEEN NO OBJECTIONS AND NO OPT-OUTS

41. The Court's preliminary approval order approving the proposed notice plan included an objection and opt-out period pursuant to Federal Rule of Civil Procedure 23(e). This objection and opt-out period ended on October 2, 2026.

42. Neither JND nor Class Counsel has received any objections or opt-out requests by the October 2, 2026 deadline nor afterwards, through the date this declaration has been executed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of October 2026 in Los Angeles, California.

/s/ Steven G. Sklaver
Steven G. Sklaver

EXHIBIT 1

The Susman Godfrey Difference

For more than four decades, Susman Godfrey has focused its nationally recognized practice on one thing: high-stakes commercial litigation and trials. With offices in Houston, Los Angeles, New York, and Seattle, the firm is widely recognized as one of the nation's premier trial boutiques, known for trying complex, business-critical disputes in courtrooms across the United States. Susman Godfrey's track record of landmark victories, elite trial talent, and sustained excellence has earned repeated recognition as the country's leading litigation boutique, including being named *American Lawyer's* "Litigation Boutique of the Year" multiple times, inclusion on the *National Law Journal's* "America's Elite Trial Lawyers" list, and recognition by *Benchmark Litigation* as National Trial Firm of the Year. Vault has also ranked Susman Godfrey the #1 Litigation Boutique in America for sixteen consecutive years.

The Will to Win

Susman Godfrey is a trial firm first. We prepare every case with a singular focus on winning at trial, not prolonging litigation. Our reputation as one of the nation's premier trial firms means opponents know we are prepared to take cases all the way to verdict—a reality that often drives favorable resolutions.

Clients frequently turn to Susman Godfrey in the highest-stakes matters, including on the eve of trial, when the outcome depends on proven courtroom advocates with a record of delivering results before judges, juries, and arbitrators nationwide.

Our interests are aligned with those of our clients. We regularly handle matters on a contingency-fee basis, sharing both the risk and the reward. Every contingent-fee case is evaluated firmwide, and every lawyer at Susman Godfrey has a stake in the outcome. That model has helped define our culture for decades: total commitment, shared accountability, and an unwavering focus on winning.

Unique Perspective

Susman Godfrey represents both plaintiffs and defendants. We thrive on variety, flexibility, and creativity. Clients appreciate the insights that our broad experience brings. Our dual perspective informs not just our trial tactics, but also our approach to settlement negotiations and mediation presentations. We are successful in court because we understand our opponent's case as well as our own.

An Uncommon Structure

As a business, we are lean, mean and un-leveraged. To counter the structural bloat of our opponents, who often have three associates for each partner, we rely on creativity and efficiency.

Our experience has taught us what is important at trial and what can be safely ignored. We limit document discovery and depositions to the essential. For depositions and case-related events we send one attorney to handle the matter. After four decades of trials, we know what is critical—and what is a waste of time.

Unparalleled Talent

Susman Godfrey prides itself on a talent pool as deep as any firm in the country. Clerking for a judge in the federal court system is the best training for a young trial attorney, 100% of our Associates and over 95% of our Partners served in these highly sought-after clerkships after law school. Ten of our trial lawyers have clerked at the highest level—for Justices of the United States Supreme Court.

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Class Action Appointments & Lead Counsel

- ***In re Automotive Parts Antitrust Litigation***. Secured, to date, over $1.2 billion in settlements to date as Court-appointed co-lead counsel for a class of end payor plaintiffs in this complex series of antitrust cases brought against dozens of automobile suppliers who engaged in price-fixing and bid-rigging in the multi-billion-dollar automotive parts industry.
- ***In re Libor-based Financial Instruments Antitrust Litigation.*** Secured, to date, $780 million in settlements for plaintiffs who allege several banks were involved in setting LIBOR and manipulating it to their advantage as Court-appointed co-lead class counsel.
- ***In re National Football League's "Sunday Ticket" Antitrust Litigation.*** As Court-appointed co-lead counsel to plaintiffs, obtained a victory after 3 weeks of trial with a jury finding the NFL engaged in a conspiracy and violated the antitrust laws through its Sunday Ticket offering. The jury awarded $4.7 billion damages, which the trial court vacated on a post-trial motion, while leaving untouched the jury's determination that the NFL violated two different provisions of the Sherman Act. Proceedings in the matter are ongoing.
- ***In re Animators Antitrust Litigation***. As Court-appoiinted co-lead counsel, secured more than $168 million in settlements for a class of animation industry employees in this antitrust action against the largest animation companies, including Disney, Pixar, Lucas Films, DreamWorks, and Sony, based on restrictions on their ability to compete against one another for talent.
- ***In re Korean Air Lines Antitrust Litigation***. As Court-appointed co-lead counse, secured $86 million in settlements in this antitrust litigation involving more than 70 class action cases brought on behalf of airline passengers who alleged that between 2000 and 2007, Korean Air Lines and Asiana Airlines conspired to fix the price of air travel between the United States and the Republic of Korea.
- ***In re Dental Supplies Antitrust Litigation***. Appointed co-lead counsel for the plaintiffs in a nationwide antitrust class action against the largest distributors of dental supplies and equipment. Plaintiffs alleged that the defendants had illegally agreed not to compete on prices for products sold to dental offices and laboratories. In 2018, a settlement was reached for $80 million.
- ***In re NYC Bus Tour Antitrust Litigation.*** As Court-appointed lead counsel, secured a $19 million cash settlement for customers of two New York City tour bus companies, Coach USA Inc. and City Sights LLC, and their joint venture, Twin America LLC.
- ***In re Telescopes.*** Serving as interim co-lead counsel representing a putative class of indirect purchasers of amateur telescopes impacted by a conspiracy to fix prices and allocate markets for telescopes sold to consumers in the United States. A $32 million settlement was reached with one of the defendants and litigation is ongoing against the other named defendants.
- ***In re Vitamin C Antitrust Litigation.*** As lead counsel, secured a $54.1 million jury verdict in an antitrust price-fixing class action brought on behalf of direct purchasers of vitamin C against two Chinese vitamin C manufacturers in the first-ever case in which mainland Chinese companies were successfully sued under US antitrust law. The verdict was tripled as required by law and, after adjusting for $32.5 million in settlements with other defendants, a final judgment of $147 million was entered against the defendants. This antitrust price-fixing

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class action was later reviewed by the United States Supreme Court, which issued a unanimous 9-0 decision in favor of the plaintiffs.

- ***Behrehnd et al. v. Comcast***. Represented a class of 800,000 Comcast cable subscribers who alleged that between 2003 and 2008, Comcast and other cable companies entered into subscriber swaps and acquisitions that deterred over-builder competition and enabled Comcast to raise prices to supra-competitive levels, in violation of sections 1 and 2 of the Sherman Act. The parties settled for $50 million after remand of the case from the Supreme Court.
- ***Google AdWords Class Action.*** Obtained a $20 million settlement for a class against Google for breach of contract, unfair competition, and false advertising relating to Google's AdWords billing practices and related disclosures.
- ***White v. NCAA***. Served as co-lead counsel in an antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. The NCAA settled and paid, in addition to fees and expenses, $218 million for use by current student-athletes to cover the costs of attending college and paid $10 million to cover educational and professional development expenses for former student-athletes.

Cost of Insurance Litigation

- ***In re AXA Equitable Life Insurance Company COI Litigation***. Secured a $307.5 million deal for a putative class of plaintiffs who challenged AXA's 2016 hike of cost on insurance rates on hundreds of elderly insureds, claiming AXA unfairly increased the cost of insurance for certain flexible-premium universal life insurance policies.
- ***Leonard et al. v. John Hancock Life Insurance Co. of New York et al.*** Secured a settlement valued at $143 million, before fees and expenses, including a cash fund of over $93 million and an agreement with John Hancock Life Insurance Company not to impose a higher cost of insurance rate scale for 5 years (even in the face of a worldwide pandemic), on behalf of a class of approximately 1,200 policyholders who alleged that Hancock breached the terms of their respective life insurance policies and overcharged them for life insurance. When granting final approval, the Court held that the settlement provided an "absolutely extraordinary" recovery rate for the class, and lauded Susman Godfrey's "extraordinary work."
- ***Helen Hanks v. Voya Retirement Insurance and Annuity Company.*** Negotiated settlement worth $118 million, before fees and expenses, including a cash fund of over $92 million and an agreement by Voya not to impose a higher rate scale for 5 years, on behalf of a certified class of 46,000+ policyholders over allegations that Voya improperly raised cost-of-insurance charges. Over the course of litigation, the team from Susman Godfrey secured certification of the nationwide class and defeated summary judgment. The Court recognized the quality of the work, stating: "I want to commend you all for the work done on the pretrial order and motions in limine . . . I'm very happy to have you as lawyers appearing before me."
- ***37 Bensen Parkway v. John Hancock Life Insurance Company***. Secured a $91.25 million settlement all-cash, non-reversionary settlement (before fees and expenses) for insurance policy owners against John

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Hancock Life Insurance Company. The Honorable Paul Gardephe described the settlement as a "quite extraordinary . . . result achieved on behalf of the class."

- ***PHT Holdings II LLC v. North American Company for Life and Health Insurance.*** Secured a settlement of $59 million for plaintiffs in an insurance breach of contract class action against North American Insurance Company.
- ***Fleisher et al. v. Phoenix Life Insurance Company***. Served as lead counsel to plaintiffs in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final pretrial conference: a $48.5 million cash fund ($34 million after fees and expenses), a COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded: "I want to say publicly that I think this is an excellent settlement. I think this is a superb—this may be the best settlement pound for pound for the class that I've ever seen."
- ***Advance Trust & Life Escrow Services, LTA v. ReliaStar Life Insurance Co.*** Represented a class of universal life insurance policyholders against ReliaStar Life Insurance Company stemming from ReliaStar's failure to charge cost of insurance rates in accordance with the terms of its policies. SG secured a $39 million non-reversionary settlement fund, plus additional non-monetary benefits for the class.
- ***PHT Holding I LLC v. Security Life of Denver Insurance Company***. Represented a class of life insurance policyholders in a breach-of-contract suit against Security Life of Denver challenging increases to cost-of-insurance charges. SG secured class certification of a 31-state class on a state law breach-of-contract claim. On the eve of trial, the parties settled for $30 million (before fees and expenses), a settlement the Court subsequently approved.
- ***Brighton Trustees, LLC et al., v. Genworth Life and Annuity Insurance Company.*** Secured class certification, a settlement valued at $25 million, before fees and expenses, and a promise by Genworth not to adopt an increase rate scale for 7 years, even in the face of a worldwide pandemic or any new one to come.
- ***Lincoln Life v. LPC Holdings.*** Represented an insurance trust in STOLI litigation against an insurance company seeking to rescind a life insurance policy with a face value of $20 million. After SG won a hotly contested motion to compel in which the Court threatened to revoke the pro hoc license of opposing counsel, Lincoln settled the case on very favorable terms.

Disclaimer: The information contained herein is revised frequently and is only accurate and current as of the date provided. Please call us for the most recent edition.



Steven G. Sklaver

Partner

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Overview

Named one of *Lawdragon's* 500 Leading Lawyers since 2020, a recipient of the California Lawyer Attorneys of the Year award in 2017 and selected as "Top Plaintiff Lawyers in all of California" in 2016 and 2017 by *The Daily Journal;* Steven Sklaver has secured substantial litigation victories for both plaintiffs and defendants. For plaintiffs, Sklaver was lead counsel for a certified class of insurance policy owners, helping them achieve what the Court in the Southern District of New York described as "the best settlement pound for pound for the class that I've ever seen." You can read the Court's statement in full here. You can also read more about the case in The Deal's profile on the litigation here. Sklaver was also lead trial and appellate counsel for investors against an insurance company that resulted in a complete victory and full pay-out of a $20 million life insurance policy. A copy of the appellate court decision is available here. To listen to Sklaver's appellate oral argument, click here. That matter was the feature cover story of the April 2012 California Lawyer.

Sklaver also represents the former members of the legendary rock group The Turtles in ***Flo & Eddie, Inc. v. Sirius XM Radio, Inc.*** (C.D. Cal.) in a certified class action lawsuit against Sirius XM that settled less than 48 hours before the jury trial was scheduled to begin. Sirius XM agreed to pay at least $25.5 million (over $16 million after fees and expenses) and royalties under a 10-year license that is valued up to $62 million (over $41 million after fees and expenses) as compensation for publicly performing without a license Pre-1972 sound recordings. The settlement was approved by the Court, and has received widespread media coverage from publications such as The New York Times, Billboard, The Hollywood Reporter,Law360, Rolling Stone, Variety, Reuters and Managing IP.

Within six months after the Sirius XM class action settled, so did Sklaver's copyright class action brought on behalf of artists owed mechanical royalties for compositions made available by Spotify, the leader in digital music

streaming. Spotify agreed to a class action settlement valued at over $112 million (over $95 million after fees and expenses), a settlement for which the district court granted final approval and remains subject to a pending appeal. You can read more about this matter in *Billboard*.

Sklaver's many significant and widely covered class action results in 2016 helped secure Susman Godfrey's recognition as *Law360*'s "Class Action Group of the Year" in early 2017. You can read that article announcing the award here.

For defendants, Sklaver has handled numerous employment class actions across the country. He served, along with the Managing Partner of Susman Godfrey, as trial counsel for Wal-Mart, the world's largest retailer, trying a large employment class action in California. He also successfully defended and defeated class certification in numerous, substantial wage and hour matters for Alta-Dena Certified Dairy, LLC, dairy producers for Dean Foods, one of the leading food and beverage companies in the United States. Copies of the pro-employer decisions are available here, here, and here.

Sklaver has tried complex commercial and class action disputes — including jury trials and bench trials in federal and state court, as well as arbitrations. Sklaver graduated cum laude from Dartmouth College, magna cum laude and Order of the Coif from Northwestern University School of Law, and clerked for Judge David Ebel on the United States Court of Appeals for the Tenth Circuit. Sklaver also won the National Debate Tournament for Dartmouth College, and is just one of four individuals in debate history to win three national championships at the high school and collegiate level. From 2010-2022, Sklaver has been recognized every year as a "Super Lawyer" in Southern California, awarded to no more than the top 5% of the lawyers in the state of California (Law & Politics Magazine, Thomson Reuters).

Sklaver currently serves on the Board of Directors for the Western Center on Law & Poverty. Sklaver was also previously selected as a Ninth Circuit Judicial Conference Lawyer Representative.

Notable Representations

Class Actions

- ***Copyright Infringement:*** Sklaver serves as co-lead counsel with the Gradstein & Marzano firm representing Flo & Eddie (the founding members of 70's music group, The Turtles) along with a class of owners of pre-1972 sound recordings for copyright violations by music provider Sirius XM. The day before trial was to commence before a California jury in federal court in late 2016, Flo & Eddie reached a landmark settlement with Sirius XM on behalf of the class in a deal potentially worth $99 million. The Court granted final approval of the settlement in May 2017. Click here for more. Sklaver with his co-leads were recently named

"California Lawyer Attorneys of the Year" by *The Daily Journal* for their outstanding legal work on this case.

- In May 2017, Sklaver, as co-lead counsel with Gradstein Marzano, secured a deal valued at$112 million to settle a class-action lawsuit with Spotify brought on behalf of music copyright owners. The suit alleged that Spotify made music available online without securing mechanical rights from the tracks' composers. Under the terms of the deal, Spotify will pay songwriters $43.45 million for past royalties, as well as commit to pay ongoing royalties that are valued at $63 million. Read more about the case here and see Billboards coverage of it here.

- ***Insurance***: In a seminal insurance class action filed in the Southern District of New York, resolved in September 2015, Mr. Sklaver served as lead counsel in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final Pretrial Conference — less than two months before trial. Settlement terms included: $48.5 million cash fund ($34 million after fees and expenses), COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded, ***"I want to say publicly that I think this is an excellent settlement. I think this is a superb – this may be the best settlement pound for pound for the class that I've ever seen."*** You can read the statement in full on page 3 here. You can also read more about the case in *The Deal's* feature on the matter here.

- ***Antitrust:*** *In In re Automotive Parts Antitrust Litigation.* In the largest price-fixing cartel ever brought to light, Mr. Sklaver and a team of Susman Godfrey lawyers run a massive MDL litigation in which the firm serves as co-lead counsel for a class of consumer plaintiffs in multidistrict price-fixing cases pending in a Detroit, Michigan federal court. The actions, alleging anti-competitive conduct, were brought by indirect purchasers of component parts included in over 20 million automobiles, and involve parts such as wire harnesses, instrument panel clusters, fuel senders, heater control panels and alternators. The Department of Justice has imposed fines exceeding $2.6 billion pursuant to guilty plea agreements with some of the defendants, and its investigation is still ongoing. The Susman Godfrey team together with its co-lead counsel has defeated multiple motions to dismiss. Settlements have been reached with a certain defendants for a combined $620 million thus far. Final settlement (after fees and expenses) has not yet been determined. The case remains ongoing against the remaining defendants.

Life Settlements

- Represented Jonathan Berck, as Trustee of the Rosamond Janis Insurance Trust in a $5 million rescission claim brought by the Lincoln Life and Annuity Company of New York for alleged violations of New York's insurable interest laws and other "STOLI" (stranger originated life insurance) related claims. RESULT: Summary judgment granted in favor of my client. A copy of the summary judgment order is available here.
- Won reversal in a $20 million life settlement rescission lawsuit against Lincoln Life & Annuity Company of New York. Lincoln's lawsuit was based on allegations that the insurance policies lacked an insurable interest because they were procured by third-parties for investment purposes and because there were net worth and other misrepresentations in the applications. The appellate court ordered that the trial court enter judgment in favor of the trust. The appellate court also affirmed our trial court victory that Lincoln's fraud claim was time barred because the policies were incontestable. The case is Lincoln Life & Annuity Co. of New York v. Jonathan Berck, as Trustee of the Jack Teren Insurance Trust, Court of Appeal Case No. D056373 (Cal. Ct. App. May 17, 2011). A copy of the appellate court decision is available here. The *Teren* case was the feature, cover story of the April 2012 *California Lawyer*.
- Represents investors, trusts, trustees, brokers, and insureds in life settlement and STOLI litigation across the country against insurance companies seeking to rescind policies with face values worth more than $125 million. Mr. Sklaver is also a frequent speaker and commentator on life settlement and STOLI litigation, in both trade publications and conferences.

Financial Fraud

- Represented Royal Standard Minerals, which was the plaintiff in a federal securities lawsuit against a "group" of more than ten dissident shareholders for failing to file Schedule 13-D disclosures. RESULT: Preliminary injunction granted and final judgment entered that, among other things, required for three years the votes of all shares owned by any of the defendants to be voted as directed by the Board of Directors of my client.
- Represented plaintiff who held millions of WorldCom shares as an opt-out to the class in In re WorldCom Securities Litig. RESULT: Settled on confidential terms.
- Represented plaintiff Accredited Home Lenders in a TRO and breach of contract action over a wrongful default declared by Wachovia in a credit re-purchase agreement. RESULT: The case was resolved favorably, following the entry of a TRO.

- Represented Walter Hewlett in his challenge to the Hewlett-Packard/Compaq merger. In preparation for that trial, Mr. Sklaver deposed Compaq's former CEO Michael Capellas about his famous handwritten journal note which, describing the merger, stated "at our course and speed we will fail." Mr. Capellas was right.

Employment

- Represented one of the world's largest retailers in the defense of a four month long jury trial, wage and hour class action pending in California. One of the world's largest retailers appointed Susman Godfrey L.L.P. to be its national trial counsel for wage and hour litigation.

Antitrust

- Lead day-to-day lawyer for the class in White, et al. v. NCAA, a certified, antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. ESPN Magazine coverage of the lawsuit may be found here. RESULT: The NCAA settled and paid an additional $218 million for use by current student-athletes to cover the costs of attending college, paid $10 million to cover educational and professional development expenses for former student-athletes, and enacted new legislation to permit Division I institutions to provide year-round comprehensive health insurance to student-athletes.

Entertainment

- Represented NAACP image award winner Morris Taylor "Buddy" Sheffield in his breach of contract lawsuit against ABC Cable Networks Group regarding the creation of Hannah Montana. RESULT: Defendant settled less than four weeks before trial.

Pro Bono

- Appointed to represent Carl Petersen, who was charged by the United States Attorney's Office with being a felon in possession of a firearm — a charge that carries a five-year prison sentence and an 89% conviction rate. RESULT: Acquittal. Jury deliberation lasted less than four hours. Appointed by the United States Court of Appeals for the Tenth Circuit as appellate counsel in five cases, including: United States v. Petersen; United States v. Blaze (specifically noting Mr. Sklaver's "good workmanship"); and Sorrentino v. IRS (appointed as amicus curiae by and for the Court)

- *Lawdragon* 500 Leading Lawyers in America (2020, 2021, 2022, 2023, 2024, 2025)

Honors & Distinctions

- *Lawdragon* 500 Leading Litigator (2023, 2024, 2025, 2026)
- *Lawdragon* 500 Leading Plaintiff Financial Lawyers (2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026)
- Firm Representative for Elite Trial Lawyers – Insurance Litigation, *National Law Journal* (2023, ALM)
- Litigation Star, Benchmark Litigation (2022 – 2025, Euromoney)
- Recommended Lawyer – Litigation – Labor and Employment, Best Lawyers in American (2020 – 2026, Woodward White, Inc.)
- Southern California California Super Lawyer (2010 – 2025, Thomson Reuters)
- Outstanding Antitrust Litigation Achievement in Private Law Practice by the American Antitrust Institute (2019) for work on *In re: Automotive Parts Antitrust Litigation*.
- California's Lawyer Attorneys of the Year in 2017 by *The Daily Journal*. Click here for a photo of Sklaver, along with co-counsel, receiving the award.
- Top 30 Plaintiff Lawyers in all of California in 2016 by *The Daily Journal*
- Southern California "Super Lawyers" awarded to no more than the top 5% of the lawyers in the state of California (2010 – 2021, *Law & Politics Magazine*, Thomson Reuters)
- Northwestern Law Review member and editor
- National Debate Tournament (NDT) collegiate championship winner

Clerkships

Honorable David M. Ebel, United States Court of Appeals for the Tenth Circuit

Education

Northwestern University School of Law (J.D., magna cum laude)

- Order of the Coif

Dartmouth College (B.A., cum laude)

Admissions

Bar Admissions

- Colorado
- California
- Illinois

Court Admissions

- United States Supreme Court
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Court of Appeals for the Tenth Circuit
- U.S. District Court for the Central District of Colorado
- U.S. District Court for the Eastern District of Colorado
- U.S. District Court for the Northern District of Colorado
- U.S. District Court for the Southern District of Colorado
- U.S. District Court for the Western District of Colorado

Leadership & Professional Memberships

- Board of Directors, Western Center on Law & Poverty



Seth Ard

Partner

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Overview

Seth Ard secures substantial legal victories for plaintiffs and defendants across the nation. Ard is a seasoned litigator who is often tapped to handle intricate, multi-party cases because of his ability to quickly understand large volumes of complex information and translate it all into compelling arguments to judges, juries and arbitration panels.

Ard has litigated cases across a myriad of practices areas including antitrust, securities, intellectual property, bankruptcy and employment. Likewise, Ard's client roster has spanned from some of the leading companies in the nation to smaller businesses and individuals. In recent years, Ard has focused a significant portion of his practice in the insurance space – frequently securing major wins for plaintiffs in class actions against insurance companies who have acted fraudulently.

LANDMARK WINS

Ard has secured nearly $1 billion dollars in relief for plaintiffs in insurance class actions who allege their insurance companies fraudulently increased COI rates. For example, he previously represented a certified class of insurance policy owners, helping them achieve what the Court in the Southern District of New York described as **"the best settlement pound for pound for the class that I've ever seen."** (Read the Court's statement in full here and more in *The Deal's* profile on the litigation here). Also, in *37 Besen Parkway, LLC v. John Hancock Life Insurance Company*, Ard secured a $91.25 million settlement (before fees and expenses) for insurance policy owners against John Hancock Life Insurance Company. The Honorable Paul Gardephe described the settlement as a **"quite extraordinary . . . result achieved on behalf of the class."** Ard most recently secured a $307.5 million deal for a putative class of plaintiffs who challenged AXA's 2016 hike of cost on insurance rates on hundreds of elderly insureds.

Serving as court-appointed lead counsel to a certified class of plaintiffs in *In Re: NFL Sunday Ticket Antitrust Litigation*, Ard and a team from Susman

Godfrey obtained a victory after 3 weeks of trial with a jury finding the NFL engaged in a conspiracy and violated the antitrust laws through its Sunday Ticket offering. During trial, Ard cross examined the former head of CBS Sports, Sean McManus, as well as the defense's lead expert (Read about his cross of McManus on NBC Sports). The jury awarded $4.7 billion damages, which the trial court vacated on a post-trial motion, while leaving untouched the jury's determination that the NFL violated two different provisions of the Sherman Act. Proceedings in the matter are ongoing.

In *In re LIBOR-Based Financial Instruments Litigation*, Ard has secured, to date, $781 million in settlements for plaintiffs who allege several major investment banks were involved in setting LIBOR and manipulating it to their advantage. Since that time, a multitude of lawsuits have been consolidated as part of a multidistrict litigation proceeding in which Ard is playing a leading role.

On the defense side, in *Jefferies v. NASDAQ*, Ard successfully defended NASDAQ and its affiliate IDCG in an arbitration where the plaintiff sought tens of millions of dollars in damages based on a claim that it was fraudulently induced to clear interest rate swaps through the IDCG clearinghouse. After a one-week arbitration, at which Ard put on NASDAQ's expert and crossed Jefferies' expert, the Panel issued a decision denying all of Jefferies' claims and awarding no damages.

Ard also obtained a complete defense victory on summary judgment in trademark infringement dispute, *GMA v. Dorfman*. Prior to hiring Ard, Dorfman had suffered significant discovery sanctions that threatened to undermine his defense. Once hired, Ard and his team overturned those sanctions, reopened discovery and obtained key admissions, and later won the case on summary judgment.

BACKGROUND

Before joining the firm, Ard clerked for the Honorable Shira A. Scheindlin of the United States District Court for the Southern District of New York, and for the Honorable Rosemary S. Pooler of the United States Court of Appeals for the Second Circuit.

Since 2019, Ard has been named one of the country's Leading Plaintiff Financial Lawyers by Lawdragon. He has also repeatedly been recognized as a "Rising Star" in New York by *Super Lawyers* magazine.

Notable Representations

Insurance

- ***In re AXA Equitable Life Insurance Company COI Litigation*** **(S.D.N.Y)** Secured a $307.5 million deal for a putative class of plaintiffs who challenged AXA's 2016 hike of cost on insurance rates on hundreds of

elderly insureds, claiming AXA unfairly increased the cost of insurance for certain flexible-premium universal life insurance policies.

- ***Leonard et al. v. John Hancock Life Insurance Co. of New York et al.* (S.D.N.Y.)** Secured a settlement valued at $143 million, before fees and expenses, including a cash fund of over $93 million and an agreement with John Hancock Life Insurance Company not to impose a higher cost of insurance rate scale for 5 years (even in the face of a worldwide pandemic), on behalf of a class of approximately 1,200 policyholders who alleged that Hancock breached the terms of their respective life insurance policies and overcharged them for life insurance. When granting final approval, the Court held that the settlement provided an "**absolutely extraordinary" recovery rate for the class, and lauded Susman Godfrey's "extraordinary work.**"
- ***Helen Hanks v. Voya Retirement Insurance and Annuity Company* (S.D.N.Y.)** Negotiated settlement worth $118 million, before fees and expenses, including a cash fund of over $92 million and an agreement by Voya not to impose a higher rate scale for 5 years, on behalf of a certified class of 46,000+ policyholders over allegations that Voya improperly raised cost-of-insurance charges. Over the course of litigation, the team from Susman Godfrey secured certification of the nationwide class and defeated summary judgment. The Court recognized the quality of the work, stating: "**I want to commend you all for the work done on the pretrial order and motions in limine . . . I'm very happy to have you as lawyers appearing before me.**"
- ***37 Bensen Parkway v. John Hancock Life Insurance Company* (S.D.N.Y)** Secured a $91.25 million settlement all-cash, non-reversionary settlement (before fees and expenses) for insurance policy owners against John Hancock Life Insurance Company. The Honorable Paul Gardephe described the settlement as a "**quite extraordinary . . . result achieved on behalf of the class.**"
- ***PHT Holdings II LLC v. North American Company for Life and Health Insurance* (S.D. Iowa).** Secured a settlement of $59 million for plaintiffs in an insurance breach of contract class action against North American Insurance Company.
- ***Fleisher et al. v. Phoenix Life Insurance Company* (S.D.N.Y.)** Served as lead counsel to plaintiffs in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final pretrial conference: a $48.5 million cash fund ($34 million after fees and expenses), a COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval

hearing, the Court concluded: "**I want to say publicly that I think this is an excellent settlement. I think this is a superb—this may be the best settlement pound for pound for the class that I've ever seen.**"

- ***Advance Trust & Life Escrow Services, LTA v. ReliaStar Life Insurance Co.* (D. Minn.)** Represented a class of universal life insurance policyholders against ReliaStar Life Insurance Company stemming from ReliaStar's failure to charge cost of insurance rates in accordance with the terms of its policies. Ard and his team secured a $39 million non-reversionary settlement fund, plus additional non-monetary benefits for the class.
- ***PHT Holding I LLC v. Security Life of Denver Insurance Company* (D. Colo.)** Represented a class of life insurance policyholders in a breach-of-contract suit against Security Life of Denver challenging increases to cost-of-insurance charges. Ard's team secured class certification of a 31-state class on a state law breach-of-contract claim. On the eve of trial, the parties settled for $30 million (before fees and expenses), a settlement the Court subsequently approved.
- ***Brighton Trustees, LLC et al., v. Genworth Life and Annuity Insurance Company* (E.D. Va.)** Secured class certification, a settlement valued at $25 million, before fees and expenses, and a promise by Genworth not to adopt an increase rate scale for 7 years, even in the face of a worldwide pandemic or any new one to come.
- ***Lincoln Life v. LPC Holdings* (Supreme Court Onandaga, New York)** Represented an insurance trust in STOLI litigation against an insurance company seeking to rescind a life insurance policy with a face value of $20 million. After Ard argued and won a hotly contested motion to compel in which the Court threatened to revoke the pro hoc license of opposing counsel, Lincoln settled the case on very favorable terms.

Intellectual Property

- ***Globus Medical v. Bonutti Skeletal* (E.D. Pa.)** Represents Globus Medical in patent litigation against Bonutti Skeletal. Ard successfully argued a partial motion to dismiss the patent complaint, defeating claims of indirect infringement, vicarious liability and punitive damages.
- ***Sentius v. Microsoft* (N.D. Cal.)** Represented Sentius against Microsoft in a patent infringement suit involving automated database technology. The case settled on highly favorable terms within 24 hours of the court issuing orders on those motions.
- ***Dorfman Pacific* (S.D.N.Y.)** Obtained a complete defense victory on summary judgment in a trademark infringement dispute before Judge Forrest. Ard was hired after the close of discovery and after our client had suffered significant discovery sanctions that threatened to undermine its defense. His team was able to overturn those sanctions, reopen discovery and obtain key admissions during a deposition of Plaintiff's

CEO, and win on summary judgment (without argument and based on briefing done by Ard).

Securities

- ***In re Municipal Derivatives Litigation*** **(S.D.N.Y.)** Served as co-lead counsel to a class of municipalities suing 10 large banks and broker for rigging municipal auctions. A total of over $220 million dollars in settlements were achieved on behalf of the class (net fees and expenses not yet determined).
- ***Jefferies v. NASDAQ Arbitration*** **(New York)** Defended NASDAQ and its affiliate IDCG in an arbitration where the plaintiff sought tens of millions of dollars in damages based on a claim that it was fraudulently induced to clear interest rate swaps through the IDCG clearinghouse. After a one-week arbitration, at which Ard put on NASDAQ's expert and crossed Jefferies' expert, the Panel issued a decision denying all of Jefferies' claims and awarding no damages. The arbitrators were former Judge Layn Phillips, Judge Vaughn R. Walker, and Judge Abraham D. Sofaer.

Other High Stakes Commercial Litigation

- ***In re: National Football League's Sunday Ticket Antitrust Litigation*** **(C.D. Cal.)** Serving as trial counsel to a certified class of plaintiffs, obtained a victory after 3 weeks of trial with a jury finding the NFL engaged in a conspiracy and violated the antitrust laws through its Sunday Ticket offering. The jury awarded $4.7 billion damages, which the trial court vacated on a post-trial motion, while leaving untouched the jury's determination that the NFL violated two different provisions of the Sherman Act. Proceedings in the matter are ongoing. During trial, Ard cross examined the former head of CBS Sports, Sean McManus, as well as the defense's lead expert. Read about his cross of McManus on NBC Sports.
- ***City of Baltimore Opioid Litigation***. Representing the Mayor and City Council of Baltimore in fraud and public tort litigation against the manufacturers and distributors of opioids, whose conduct has devastated cities, counties, and states nationwide. So far Ard's team has secured a historic $322.5 million in settlement collectively from with Allergan Finance, LLC, Walgreens, Cardinal Health, and CVS to resolve the City's claims. Read more.
- ***Washington Mutual Bankruptcy*** **(Bkrtcy. Del.)** Retained to represent the Equity Committee in the Washington Mutual bankruptcy. In two multi-week plan-confirmation hearings, Ard opposed plans that would have wiped out shareholders. Although both plans were supported by the debtor and by all major creditors, the Court rejected both plans after the trials (both in which Ard examined and cross-examined key witnesses). Ard and his team then negotiated terms of a new plan that distributed over

$100 million in value to shareholders, including 90% ownership of the reorganized debtor.

- ***Audet v. Garza* (D. Ct)** Serving as lead counsel for a certified class of thousands of investors in GAW Mining LLC who allege that the cryptocurrency mining venture in which they invested was in fact a Ponzi scheme.

Honors & Distinctions

- *Lawdragon* 500 Leading Litigator (2023, 2024, 2025, 2026)
- *Lawdragon* 500 Leading Plaintiff Financial Lawyers (2019, 2020, 2021 2022, 2023, 2024, 2025, 2026)
- New York Super Lawyer (2022, 2023, 2024, 2025, Thomson Reuters)
- New York Rising Star (2013-2018, Thomson Reuters)
- Teaching and Research Assistant for Professor Arthur Miller (Harvard Law School)
- Teaching Assistant for Professor Jon Hanson (Harvard Law School)
- Editorial Board, Harvard Civil Rights/Civil Liberties Law Review

Clerkships

Honorable Shira A. Scheindlin, United States District Court for the Southern District of New York, 2008-2009

Honorable Rosemary S. Pooler, United States Court of Appeals for the Second Circuit, 2007-2008

Education

Harvard Law School (J.D., magna cum laude, 2007)

Northwestern University (M.A., A.B.D., Philosophy, 2003)

Michigan State University (B.A., Philosophy & French Literature, first in class, Highest Honors, 1997)

Admissions

Bar Admissions

- New York

Court Admissions

- U.S. District Court for the Southern District of New York
- U.S. District Court for the Eastern District of New York
- U.S. District Court for the District of Colorado

- U.S. Court of Appeals for the Second Circuit
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Court of Appeals for the Eleventh Circuit
- United States National Court, Judicial Panel on Multidistrict Litigation

Languages

French



Ryan Kirkpatrick

Partner

New York

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rkirkpatrick@susmangodfrey.com

Overview

Ryan Kirkpatrick has a proven track record of successfully managing and directing a wide variety of multinational, complex legal matters. Ryan has obtained or negotiated billions of dollars in judgments, settlements, and transactions. Given his work on both the plaintiff and defense sides, Ryan possesses a deep understanding of and how to successfully leverage litigation (and the threat of it) to accomplish financial and business objectives while at the same time mitigating the financial and operational costs of litigation to a business.

Ryan has been interviewed and quoted by numerous media outlets, including the *Wall Street Journal, Bloomberg News*, *Vanity Fair,* the *Los Angeles Time*, ESPN, the *National Law Journal*, the *Associated Press*, KABC, and KTLA.

LANDMARK LITIGATION

Ryan focuses his work on large-scale complex class actions and professional negligence and fiduciary claims litigation.

Insurance Class Actions

Ryan has is at the forefront of litigation that actively protects life insurance policy holders in breach of contract litigation against some of the country's largest insurers. **He has secured over $700 million in relief for plaintiffs in class actions against leading insurance companies** including PHL Variable Life Insurance Company, Genworth, Voya, Lincoln, ReliaStar, Security Life of Denver, American General, North American, and John Hancock Life Insurance Company. Ryan is currently representing policyholders in a new wave of cost of insurance ("COI") litigation arising from the Tax Cuts & Jobs Act of 2017.

Professional Negligence and Malpractice

Ryan served as lead counsel for John Fish, the Chairman and CEO of Suffolk Construction, in a case the Superior Court of Massachusetts against the law firm of Goulston & Storrs over allegations of legal malpractice, breach of fiduciary duty, and willful violations of Massachusetts General Laws Chapter 93A, arising out of a failed billion-dollar real estate development project in Boston's Back Bay. Ryan obtained a highly favorable settlement after prevailing on motions to compel discovery and obtaining critical liability evidence. Read more.

Ryan also served as counsel in a confidential legal malpractice matter that settled before a complaint was ever filed for an amount that was at the time one of the highest legal malpractice payouts in United States history.

Ryan is now serving as counsel to the Special Litigation Committee (SLC) for the Trust for Advised Portfolios in investigating professional negligence claims relating to the Infinity Q Diversified Alpha Fund.

BACKGROUND

Ryan rejoined Susman Godfrey in 2017 after spending four years as General Counsel and Senior Managing Director of McCourt Global, an alternative asset management firm. Ryan served as head of the New York office where he oversaw all legal affairs of the firm and its business verticals, including a $1 billion commercial real estate development joint venture, MG Sports & Media (which owned the LA Marathon and the French football club Olympique de Marseille, and co-owned Global Champions Tour and Global Champions League), and MG Capital (owner of a private direct lender and registered investment adviser).

While serving as Director of Global Champions League, Ryan initiated an EU competition law action against Fédération Equestre International (FEI), the international governing body for equestrian sports. After obtaining a landmark preliminary injunction that was upheld by the Brussels Court of Appeals—and has implications for all international sports federations—Ryan negotiated a highly favorable settlement with the FEI. This use of EU competition law to effect worldwide relief for a client was reminiscent of one of Ryan's first cases at Susman Godfrey, where he and Steve Susman guided start-up mainframe manufacturer Platform Solutions, Inc. to a $200 million buy-out by IBM following years of contentious of antitrust, patent infringement, and copyright infringement proceedings in both the Southern District of New York and the European Commission.

Ryan was first elected to the Susman Godfrey partnership in 2011. At the time, he was representing Frank McCourt and the Los Angeles Dodgers in connection with Mr. McCourt's highly-publicized divorce and the team's bankruptcy. This three-year representation culminated in a favorable settlement of the divorce, the sale of the Dodgers to Guggenheim Partners for $2.15 billion—the highest amount ever paid for a professional sports franchise—and the formation of a $1 billion joint venture with affiliates of

Guggenheim Partners. Shortly following the sale, Mr. McCourt asked Ryan to help lead McCourt Global.

Since returning to the firm, Ryan has remained active in sports-related legal matters. Most recently, he represented John Bowlen, then-minority owner of the Denver Broncos, in connection with the $4.65 million sale of the Denver Broncos.

Notable Representations

Insurance Class Actions

- ***Fleisher v. Phoenix Life Insurance* (S.D.N.Y.)** Served as counsel to plaintiffs in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final pretrial conference—less than two months before trial with terms that included: a $48.5 million cash fund ($34 million after fees and expenses), a COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded: "I want to say publicly that I think this is an excellent settlement. I think this is a superb—this may be the best settlement pound for pound for the class that I've ever seen."
- ***Helen Hanks v. Voya Retirement Insurance and Annuity Company* (S.D.N.Y.)** Negotiated settlement worth $118 million, before fees and expenses, including a cash fund of over $92 million and an agreement by Voya not to impose a higher rate scale for 5 years, on behalf of a certified class of 46,000+ policyholders over allegations that Voya improperly raised cost-of-insurance charges. Over the course of litigation, Ryan's team secured class certification and defeated summary judgment. The Court recognized the quality of the work, stating: "I want to commend you all for the work done on the pretrial order and motions in limine . . . I'm very happy to have you as lawyers appearing before me."
- ***PHT Holdings I v. Security Life Insurance Company of Denver* (D. Colorado)** Secured a $30 million settlement for a class of insurance policy holders in a case that challenged Security Life of Denver's decision to raise cost of insurance rates on Strategic Accumulator policyholders. Net award after fees and expenses to be determined.
- ***Leonard v. John Hancock* (S.D.N.Y)** Secured a $92.5 million cash settlement (before fees and expenses), plus an additional $50 million in non-monetary benefits, for Performance UL policyholders that were subjected to a rate increase in 2017. The cash amount, by itself, represented 91.25% of the alleged overcharges as of the date of the

settlement, and the settlement was praised by the Court as an "outstanding result" for the class.

- ***North American COI* (S.D. Iowa)** Secured a settlement on the eve of trial for benefits totaling $61.3 million, including $59 million in monetary payments to class members (before fees and expenses), in an insurance breach of contract class action on behalf of a class of policy holders against North American Life and Health Insurance Company.
- ***Brighton Trustees et al. v. Genworth Life and Annuity Insurance Company* (E.D. Va.)** Secured $25 million settlement between Genworth Life & Annuity Insurance Company and a class of more than 13,400 plaintiffs alleging that policyholders of the company's Gold and Gold II universal life insurance policies were subject to unlawful cost of insurance (COI) increases. This amount represented 163% of the alleged damages at the time of the settlement.
- ***Advance Trust & Life Escrow Services, LTA v. ReliaStar Life Insurance Co.* (D. Minn.)** After prevailing on motions for class certification and summary judgment, secured a $47.7 million settlement, including a $39 million cash fund (before fees and expenses), for a class of universal life insurance policyholders who alleged that ReliaStar failed to reduce COI rates to reflect mortality improvement.
- ***LSIMC LLC v. American General Life Insurance Co.*(C.D. Cal.)** Settled class action against American General for relief valued at $55 million for a class of policy holders who alleged that American General was under-paying interest on their universal life policies.
- ***James Kenney v. PHL Variable Insurance Company* (S.D.N.Y.)** Secured $43.5 million in settlement benefits, including a $17.4 million cash fund (before fees and expenses), for a class of insurance policyholders who allege that PHL unlawfully raised insurance rates.

Professional Negligence and Malpractice

- ***Fish v. Goulston & Storrs PC* (Suffolk County Superior Court of Massachusetts)** Served as lead counsel to real estate developer John Fish in an action against Goulston & Storrs PC alleging legal malpractice, breach of fiduciary duty, and willful violations of Massachusetts General Laws Chapter 93A, arising out of a failed billion-dollar real estate development project in Boston's Back Bay. Obtained a highly favorable settlement after prevailing on motions to compel discovery and obtaining critical liability evidence.
- **Securities Professional Negligence Litigation.** Currently serving as counsel to the Special Litigation Committee (SLC) for the Trust for Advised Portfolios in investigating professional negligence claims relating to the Infinity Q Diversified Alpha Fund.

- **Litigation on Behalf of Visium Asset Management.** Serve as lead counsel for Visium Asset Management in a case alleging that brokers aided and abetted a breach of fiduciary duties.
- **Confidential Legal Malpractice Litigation.** Confidentially represented a prominent California family in legal malpractice claims related to trust and estates and tax structuring.

General Commercial Litigation

- ***McCourt v. McCourt.*** Represented Los Angeles Dodgers' owner, Frank McCourt and the Los Angeles Dodgers in divorce and bankruptcy proceeding that involved a dispute over ownership and control of the team. The case resulted in a favorable settlement of the divorce, sale of the Dodgers to Guggenheim Partners for $2.15 billion—the highest amount paid for a professional sports franchise—and the formation of a new joint venture with Guggenheim Partners affiliates.
- ***PSI v. IBM* (S.D.N.Y.)**. Represented startup mainframe computer manufacturer Platform Solutions Inc. (PSI), in prosecuting multi-hundred-million-dollar antitrust claims against IBM and defending against patent infringement, copyright, and trade secrets claims brought by IBM. Ryan also coordinated PSI's prosecution of competition claims against IBM in the EU. The case settled on confidential terms. As part of the settlement, PSI was acquired by IBM.
- ***Masimo v. Tyco* (C.D. Cal.)** Obtained a $45 million damages judgment on behalf of Masimo Corporation in an antitrust case against Tyco Healthcare involving pulse oximetry products. The judgment was upheld by the Ninth Circuit on appeal, with the client receiving a net recovery of approximately $27 million.
- ***McGuire v. Dendreon Corp.* (W.D. Wash.)** Represented plaintiffs in a consolidated securities fraud class action cases filed in Seattle federal court. Plaintiffs alleged that defendants had made false and misleading statements about a new drug that the company planned to sell. The case was settled for $16.5 million, with the class receiving approximately $12 million.
- **Hedge Fund Litigation.** Successfully represented various hedge funds investing in "stranger-owned life insurance." Obtained a complete defense victory for a hedge fund in a case in which an insurer sued to rescind a $20 million life insurance policy for alleged fraud and lack of an insurable interest. Initiated a class action against an insurer relating to cost of insurance increases that resulted in a settlement valued at $134 million.

Honors & Distinctions

- Top 500 Plaintiff Financial Lawyers, *Lawdragon* (2024, 2025, 2026)
- 500 Leading Litigators in America, *Lawdragon* (2023, 2024, 2025, 2026)

Clerkships

Honorable Ruggero J. Aldisert, United States Court of Appeals for the Third Circuit, 2005-2006

Education

UCLA School of Law (J.D., Order of the Coif, 2005)

Yale University (B.A., Political Science, 2001)

Admissions

Bar Admissions

- New York
- California
- District of Columbia

Court Admissions

- U.S. District Court for the Central District of California
- U.S. District Court for the Northern District of California
- U.S. Court of Appeals for the Seventh Circuit
- U.S. District Court for the Eastern District of Texas



Zach Savage

Partner

New York

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zsavage@susmangodfrey.com

Overview

A former law clerk on the Supreme Court of the United States, Zach Savage is a sophisticated trial and appellate lawyer who represents clients in complex business disputes. Zach has practiced in a broad array of litigation areas including breach of contract, class actions, defamation, intellectual property, employment, and insurance litigation. His clients range from industry leaders such as General Electric and Walmart to smaller businesses and individuals in the financial, technology, and media sectors.

Several of his matters have attracted substantial media attention, including his representation of Dominion Voting Systems in its historic defamation suits against Fox News and others, as well as his representation of the former shareholders of Yukos Oil against the Russian Federation seeking to confirm $50 billion in arbitral awards. Zach was named to Benchmark Litigation's 40 and Under Hot List in 2022 and 2023, and was identified as a Next Generation Leading Lawyer by *Lawdragon* in 2023

Some of Zach's notable results and representations are:

- ***Dominion Voting Systems Defamation Suits.*** Zach represented Dominion Voting Systems in its suit against Fox News (Del. Super.), which resulted in a historic $787.5 million settlement. He also represents Dominion in other defamation suits, including one against Mike Lindell (D.D.C.). In the Lindell suit, Zach secured complete dismissal of Lindell's counterclaims against Dominion; you can read Zach's winning briefs here and here.
- ***Wren v. Transamerica Life Insurance Company* (9th Circuit)** Zach represents a putative class of life insurance policyholders in a breach-of-contract case against Transamerica Life Insurance Company, challenging its failure to pay certain policy benefits. After the district court dismissed the claims on summary judgment, Zach briefed and argued the case at

the Ninth Circuit, obtaining a full reversal. You can read Zach's winning briefs here and here, and you can watch Zach's argument here.

- ***Hulley Enterprises v. Russian Federation* (D.D.C.)** Zach represents the former investors in Russian oil and gas company Yukos, seeking confirmation of a $50 billion arbitral award against the Russian Federation. Zach played a key role in briefing the Russian Federation's sovereign immunity motion to dismiss, which the District Court denied.
- ***PHT Holding I LLC v. Security Life of Denver Insurance Company* (D. Colo.)** Zach represented a class of life insurance policyholders in a breach-of-contract suit against Security Life of Denver challenging increases to cost-of-insurance charges. Zach secured class certification of a 31-state class on a state law breach-of-contract claim. On the eve of trial, the parties settled for $30 million, a settlement the Court subsequently approved.
- ***GE v. Nebraska Investment Finance Authority* (S.D.N.Y.)** Won breach-of-contract jury verdict for General Electric, obtaining relief valued at over $100 million. The suit, against the Nebraska Investment Finance Authority, concerned above-market interest payments under the parties' investment contracts. On appeal, the Second Circuit affirmed the verdict.. *See GE Funding Capital Markets Services, Inc. v. Nebraska Investment Finance Authority*, 767 Fed. App'x 110 (2d Cir. 2019).
- ***Avi Dorfman v. Compass* (New York Supreme Court, New York County)** Represented Avi Dorfman in a co-founder dispute against real estate brokerage Compass. After seven years of litigation, the parties settled on confidential terms, with Compass acknowledging Dorfman's role as a founding team member.

Notable Representations

Business Disputes

- ***GE v. Nebraska Investment Finance Authority* (S.D.N.Y.)** Won breach-of-contract jury verdict for General Electric, obtaining relief valued at over $100 million. The suit, against the Nebraska Investment Finance Authority, concerned above-market interest payments under the parties' investment contracts. On appeal, the Second Circuit affirmed the verdict.. *See GE Funding Capital Markets Services, Inc. v. Nebraska Investment Finance Authority*, 767 Fed. App'x 110 (2d Cir. 2019).
- **Confidential Family Office Arbitration.** Representing former employees of family office in dispute concerning alleged breaches restrictive covenants and fiduciary duties.
- ***Synergy Global Outsourcing LLC v. Hinduja Global Solutions, Inc.*** Defended U.S. subsidiary of publicly traded Indian company, Hinduja Global Solutions, Inc in breach-of-contract and fiduciary duty litigation in Texas state court.

- **Confidential Sports Agency Arbitration.** Representing sports agency in confidential arbitration concerning departure of agents to competing agency.
- ***Innovius v. Sharp Corporation* (Texas State Court, Dallas County)** Represented patent licensing business, Innovius, in a lawsuit against Sharp Corporation concerning the breach of a multi-million dollar patent licensing agreement. The parties settled on confidential terms.
- **Confidential Investment Fund Arbitration.** Represented individual against former investment fund employer in confidential arbitration concerning multi-million dollar partnership dispute. The parties settled on confidential terms.

Mass Actions

- **Wren v. Transamerica Life Insurance Company (9th Circuit)** Zach represents a putative class of life insurance policyholders in a breach-of-contract case against Transamerica Life Insurance Company, challenging its failure to pay certain policy benefits. After the district court dismissed the claims on summary judgment, Zach briefed and argued the case at the Ninth Circuit, obtaining a full reversal. You can read Zach's winning briefs here and here, and you can watch Zach's argument here.
- ***Leonard v. John Hancock* (S.D.N.Y.)** Secured final approval of a $123 million settlement on behalf of a class of life insurance policyholders in breach-of-contract suit against John Hancock who challenged its increases to cost-of-insurance charges. Read more(subscription required).
- ***Farneth v. Walmart* (W.D. Pa.)** Represented Walmart in a certified class action in Allegheny County, Pennsylvania challenging Walmart's collection of sales tax on certain in-store transactions.
- ***PHT Holding I LLC v. Security Life of Denver* (D. Colo.)** Represented a class of life insurance policyholders in a breach-of-contract suit against Security Life of Denver challenging increases to cost-of-insurance charges. Zach secured class certification of a 31-state class on a state law breach-of-contract claim. On the eve of trial, the parties settled for $30 million, a settlement the Court subsequently approved.

International Disputes

- ***Vertical Aviation v. Government of Trinidad & Tobago* (S.D.N.Y)** Represented international aviation financing and leasing company Vertical Aviation in a breach-of-contract action against the Government of Trinidad & Tobago. The parties settled on confidential terms.
- ***U.S. v. Prevezon Holdings Ltd* (2nd Cir.)** Secured writ of mandamus from the Second Circuit on behalf of third-party hedge fund client

Hermitage Capital, disqualifying its former counsel from representing the defendant in a forfeiture action brought by the United States

Honors & Distinctions

- Lawdragon 500X – The Next Generation of Leading Lawyers (2023, 2024, 2025, 2026)
- Super Lawyer *New York Super Lawyers* (2025 Thomson Reuters)
- Rising Star, *New York Super Lawyers* (2023, 2024 Thomson Reuters)
- 40 and Under Hot List, *Benchmark Litigation* (2022, 2023, 2024, Euromoney)
- Managing Editor, *NYU Law Review*
- Order of the Coif
- Pomeroy Scholar
- Weinfeld Prize for Scholarship in Procedure and Courts
- Furman Academic Scholarship

Clerkships

Honorable Elena Kagan, Supreme Court of the United States

Honorable Anthony J. Scirica, United States Court of Appeals for the Third Circuit

Honorable Jesse M. Furman, United States District Court for the Southern District of New York

Education

NYU School of Law (J.D., magna cum laude, 2013)

Princeton University (A.B., summa cum laude, 2008)

Admissions

Bar Admissions

- New York

Court Admissions

- U.S. District Court for the Southern District of New York
- U.S. District Court for the Eastern District of New York
- U.S. District Court for the Eastern District of Michigan
- U.S. District Court for the District of Columbia
- U.S. District Court for the District of Colorado

- U.S. Court of Appeals for the Second Circuit
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Court of Appeals for the Tenth Circuit
- U.S. Court of Appeals for the District of Columbia Circuit

SUSMAN GODFREY



Jason Bell

Associate

New York

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Overview

Jason Bell joined Susman Godfrey after clerking for Chief Justice of the United States, John G. Roberts, Jr., Judge Stephen A. Higginson of the United States Court of Appeals for the Fifth Circuit, and Judge Rachel P. Kovner of the United States District Court for the Eastern District of New York. Jason graduated magna cum laude from Harvard Law School, where he was a winner of the Ames Moot Court Competition.

Before attending law school, Jason received a Ph.D. in English from Yale University and a Master's degree with distinction in English and American Studies from the University of Oxford. He graduated summa cum laude from Columbia University with a degree in English.

Clerkships

Chief Justice John G. Roberts, Jr, Supreme Court of the United States

Honorable Stephen A. Higginson, United States Court of Appeals for the Fifth Circuit

Honorable Rachel P. Kovner, United States District Court for the Eastern District of New York

Education

Harvard Law School (J.D., magna cum laude)

Yale University (Ph. D., English)

University of Oxford (MSt, with distinction, English and American Studies)

Columbia University (B.A., summa cum laude, English)

Admissions

Bar Admissions

- New York
- Massachusetts

Court Admissions

- U.S. Court of Appeals for the Fifth Circuit
- U.S. Court of Appeals for the Eighth Circuit
- U.S. Court of Appeals for the Ninth Circuit

EXHIBIT 2

BONNETT FAIRBOURN FRIEDMAN & BALINT PC

ABOUT THE FIRM

Bonnett Fairbourn Friedman & Balint, PC has developed a recognized practice in the area of complex commercial litigation, including major class actions and is widely regarded as the preeminent firm in Arizona representing plaintiffs in class action proceedings. Over the last thirty-nine years, the firm has successfully handled more than 100 class action lawsuits. We have represented consumers and victims in a wide range of class action proceedings, including actions alleging antitrust claims, securities fraud, civil rights claims and consumer fraud.

Our antitrust practice includes the prosecution of class claims on behalf of direct purchasers of products as well as indirect purchaser claims. These antitrust cases include, among others, class actions against Microsoft, MasterCard, Apple Computer and sellers of products such as polyester and rubber chemicals, waste management services, financial products and other industries. In addition to our class action practice, the firm also has represented plaintiffs in individual litigation asserting antitrust claims, including Culligan International.

Bonnett Fairbourn Friedman & Balint has taken a leading role in numerous important actions on behalf of consumers and investors, and we have been responsible for many outstanding results that have yielded dozens of multi-million dollar recoveries for class members in Arizona and throughout the United States.

Bonnett Fairbourn Friedman & Balint, PC
7301 N. 16th Street, Suite 102
Phoenix, Arizona 85020
Phone: (602) 274-1100

PRACTICE AREAS

CLASS ACTION

Bonnett Fairbourn Friedman & Balint represents consumers and investors in major class action cases in federal and state courts throughout the United States. Under the direction of Andrew S. Friedman, the firm's class action section represents plaintiff classes in the following areas:

Securities Fraud: Protects institutional shareholders and individual investors from corporate fraud and mismanagement.

Consumer Protection: Protects consumers from defective products and fraudulent marketing practices.

Antitrust: Protects individuals and businesses from price fixing, unfair business practices and other anticompetitive conduct.

False Claims and Whistleblowers: Provides for awards to individuals who uncover false claims for payment submitted to the federal government.

SECURITIES

Bonnett Fairbourn Friedman & Balint has extensive experience in plaintiffs' class action securities cases in and out of the State of Arizona. Its attorneys have recovered substantial verdicts and settlements in various high-profile cases representing bondholders who have suffered significant losses due to the criminal activities of individuals in the securities and banking industries, including victimized investors in the Lincoln Savings scandal.

APPELLATE LITIGATION

Bonnett Fairbourn Friedman & Balint has extensive appellate experience at all levels of the state and federal court systems. Attorneys from the firm have appeared before the Arizona Court of Appeals, the Arizona Supreme Court, and numerous U.S. Circuit Courts. Decisions to appeal a matter are not made lightly by the firm; we carefully analyze the likelihood of a positive result for the client against the potential cost of an unfavorable outcome. Although we draw on the clerking and practical experience of many of our attorneys in making this analysis, a fully informed client is always an integral part of this process.



ANDREW S. FRIEDMAN heads the firm's class action, securities fraud, and consumer fraud practice groups. Mr. Friedman is admitted to the State Bar of Arizona and is admitted to practice before the U.S. District Court for the District of Arizona, U.S. Court of Appeals for the Ninth Circuit and the U.S. Supreme Court.

Mr. Friedman's practice is devoted primarily to litigation of major class action cases in federal and state courts in Arizona and throughout the United States. He has represented plaintiff classes in major consumer, securities fraud, antitrust, civil rights and insurance sales practices cases and other complex commercial litigation.

Securities Fraud

Mr. Friedman and other members of the firm served as Arizona counsel for the plaintiff class of investors in *In re American Continental Corp./Lincoln Savings and Loan Sec. Litig*., MDL 834 (D. Ariz.). Mr. Friedman was one of the team of lawyers who represented the class of investors who purchased debentures and/or stock in American Continental Corp., the parent company of the now-infamous Lincoln Savings & Loan. The suit charged Charles Keating, Jr., other corporate insiders, three major accounting firms, law firms and others with racketeering and violations of the securities laws. Plaintiffs' counsel actively participated in bankruptcy proceedings, multi-district litigation and, ultimately, a jury trial in Tucson, Arizona. Plaintiffs successfully recovered $240 million of the $288 million in losses sustained by the investors. After trial, the jury rendered verdicts exceeding $1 billion against Keating and other defendants.

Mr. Friedman also served, along with other members of the firm, on the court-appointed Executive Committee in the *Prudential Limited Partnerships Multi-District Litigation*, representing investors in limited partnerships sponsored by Prudential Securities. This action, which alleged racketeering and securities fraud claims on behalf of a nationwide class, resulted in a settlement providing more than $125 million in benefits to defrauded investors.

Mr. Friedman has served as plaintiffs' counsel in many other securities fraud class actions, including the following major cases: *Persky v. Pinnacle West Corp., et al.* (securities fraud class action - $35 million settlement); *Culligan International Company v. United Catalysts, Inc.* (Antitrust Action); *Sitgraves, et al. v. Allied Signal, Inc.*; *Stein v. Residential Resources, et al.* (Securities Fraud Class Action); *Gould v. Pinnacle West Corp., et al.*; *Shields v. Del Webb Corp., et al.* (Securities Fraud Class and Derivative Suit); *Hoexter v. Valley National Bank, et al.* (Securities Fraud Class Action); *Friedman, et al. v. Emerald Mortgage Investment Corporation, et al.* (Securities Fraud Class Action); *Marks, et al. v. Circle K* (Securities Fraud Class Action); *Krause v. Sierra Tucson, et al.* (Securities Fraud Class Action); *Braunstein, et al. v. Tucson Electric, et al.* (Derivative Suit); *Krause v. Sierra Pacific, et al.* (Securities Fraud Class Action); *Blinn v. Bech, et al.* (Securities Fraud Class Action); *Voss v. Cobra Industries, et al.* (Securities Fraud Class Action); *Hollywood Park Securities Litigation* (Securities Fraud Class Action); *In re America West Sec. Fraud Litig.* (Securities Fraud Class Action); *Orthologic Securities Fraud Litig.* (Securities Fraud Litigation); and *In re Vitamins Antitrust Litigation* (Antitrust Class Action).

Mr. Friedman also served as lead counsel in a number of class action cases seeking relief on behalf of investors victimized by fraudulent investment schemes, brought against professional defendants who allegedly substantially assisted in the fraud. Mr. Friedman served as co-lead counsel for investors in *Facciola, et al. v. Greenberg Traurig LLP, et al.,* a class action asserting claims against law firms and an auditor for allegedly aiding and abetting a Ponzi scheme leading to the collapse of Mortgages, Ltd.

After class certification was granted and at the conclusion of discovery, Plaintiffs secured settlements with the defendants totaling $89 million. At the conclusion of the case, the Hon. Frederick J. Martone observed:

> Class counsel were retained on a purely contingent basis in a complex case fraught with uncertainty. Counsel advanced litigation costs in excess of $1.5 million in order to prosecute this action, shouldering the risk of non-payment. Absent class counsels' willingness to advance these litigation costs, there likely would have been no common fund. Finally, counsel have demonstrated outstanding expertise, diligence, and professionalism at every stage of this litigation.

Mr. Friedman also served as lead counsel in *Gordon Noble, et al. v. Greenberg Traurig LLP, et al.,* a class action in the California Superior Court asserting claims on behalf of investors against law firms, auditors and a lender for their involvement in an alleged Ponzi scheme orchestrated by a hard money lender. After several years of hotly contested litigation, plaintiffs obtained settlements for the investor class members totaling $83 million.

Mr. Friedman and other members of the firm served as class counsel in *In re Apollo Group, Inc. Securities Litig.*, an open market securities fraud case seeking redress for allegedly false statements made by the Apollo Group, Inc. in publicly filed registration statements. After trial, the jury returned a verdict of $275 million for the Apollo shareholders, one of the largest jury verdicts ever obtained in a securities fraud case prosecuted through trial. At the conclusion of the trial, the presiding judge commented:

> [trial counsel] brought to this courtroom just extraordinary talent and preparation … [F]or the professionalism and the civility that you – and the integrity that you have all demonstrated and exuded throughout the handling of this case, it has just, I think, been very, very refreshing and rewarding to see that…[W]hat I have seen has just been truly exemplary.

Deceptive Marketing of Insurance Products

Mr. Friedman served as co-lead counsel for the certified nationwide plaintiff classes in *In re Conseco Life Insurance Company Cost of Ins. Litig*., MDL 1610 (C.D. Cal.). The suit charged that Conseco breached the terms of life insurance policies owned by over 90,000 class members. After nearly two years of litigation against an entrenched adversary, the class recovered over $400 million in damages.

Mr. Friedman and the firm were key members of a team of lawyers that brought landmark cases against major life insurance companies challenging the deceptive manner in which life insurance products were marketed to consumers during the 1980's. The first of these cases, against New York Life Insurance Co., arose from events uncovered in Arizona and resulted in a ground-breaking settlement providing benefits to class members exceeding $250 million. This settlement has been praised by regulators and commentators as an innovative solution to sales practice abuses. Subsequently, Mr. Friedman and co-counsel for plaintiffs prosecuted class actions and secured settlements against a host of other major insurance companies, including settlements with *Prudential Life Insurance Company* (exceeding $2 billion), *Metropolitan Life Insurance Company* (exceeding $1 billion), *Manulife* (exceeding $500 million) and more than 20 other companies. Mr. Friedman was instrumental in the prosecution of these actions, was a member of the settlement negotiating team and briefed and argued class certification issues at the trial level and in the appellate courts.

Mr. Friedman served as co-lead counsel in a series of class actions against insurance companies challenging the sale of deferred annuities to senior citizens. These cases alleged RICO claims and other theories to obtain redress for allegedly false and misleading representations inducing elderly

purchasers to invest their life savings in illiquid and poorly performing annuity products. Mr. Friedman and co-counsel for plaintiffs prosecuted class actions and secured settlements benefitting thousands of elderly consumers, including settlements with *Allianz Life Insurance Company of North America* ($251 million), *American Equity Investment Life Insurance Company* ($129 million), *Midland National Life Insurance Company* ($80 million), as well as settlements with *Fidelity and Guaranty Life Insurance Company, National Western Life Insurance Company, Conseco Insurance Company; Jackson National Life Insurance Company,* and *American International Group, Inc.*

Universal Life Cost of Insurance Increases

Mr. Friedman served as co-lead counsel for the Plaintiff in *Yue v. Conseco Life Ins. Co*., CV08-1506 and *Yue v. Conseco Life Ins. Co.,* CV11-9506, class actions challenging the legality of cost of insurance ("COI") increases imposed on universal life policies. These cases alleged that Conseco Insurance Company unlawfully increased the COI charges in violation of the provisions of the universal life policies allowing such increases based only on worsening mortality experience. The actions alleged that mortality has improved, not worsened over the years (because people are living longer). Conseco withdrew the COI increases during the pendency of the first case but then sought to impose a new increase shortly thereafter. Accordingly, the Plaintiff initiated a new action against Conseco challenging the new COI increase. The Court certified the proposed class of policyholders and issued an injunction halting the challenged increase. Plaintiff thereafter moved for summary judgment against Conseco. A settlement was ultimately reached which required Conseco to roll back the challenged COI increases, thereby providing settlement benefits to class members with a total projected value of $65 million.

Mr. Friedman served as co-lead counsel for the Plaintiffs in *Feller, et al. v. Transamerica Life Insurance Company*, a class action challenging increases to the monthly deduction rates ("MDR") imposed by Transamerica on various universal life policies. Plaintiffs alleged that the MDR increases implemented by Transamerica breached a uniform, express contractual term in the standardized Policies prohibiting MDR increases that recoup past losses. The district court certified a nationwide class of Policyholders and a California state law class of Policyholders. A settlement was ultimately reached which included a monetary payment to class members and a five-year moratorium on any future MDR increases. The monetary relief provided under the settlement totaled over $100 million.

Captive Reinsurance Transactions

Mr. Friedman represented plaintiffs in cases asserting that life insurance companies have offloaded insurance liabilities to affiliated captive reinsurance companies to weaken policy reserves and falsely inflate reported surplus. Plaintiffs alleged that the defendant insurance companies used these fraudulent practices to misrepresent their true financial condition to induce consumers to purchase annuities and other insurance products. These cases, which asserted claims under the federal anti-racketeering statutes, included *Ludwick v. Harbinger Group, et al.* and *Hudson v. Athene Annuity and Life Company, et al.*

Health Insurance

Mr. Friedman served as co-lead counsel representing health care providers in *In re Managed Care Litigation*, an MDL proceeding against major managed care companies seeking recovery for allegedly improper claims payment practices. Mr. Friedman represented the American Psychological Association, the American Podiatric Medical Society, the Florida Chiropractic Association and numerous individual providers in cases against Humana, Inc., CIGNA, numerous Blue Cross and Blue

Shield companies and other managed care companies. Mr. Friedman and his co-counsel secured settlements against CIGNA ($72 million) and Humana, Inc. ($20 million) in these MDL proceedings.

Mr. Friedman also is representing health care providers in proceedings against several major health care companies arising from the use of the Ingenix database to improperly reduce payments to patients, physicians and other providers. Defendants in these class action proceedings include Aetna, CIGNA and WellPoint, Inc. Mr. Friedman represents the New Jersey Psychological Association, the American Podiatric Medical Association, the California Chiropractic Association and the California Psychological Association, among other plaintiffs, in these actions.

Mr. Friedman also represented plaintiffs in class action proceedings in California against Blue Shield of California Life & Health Insurance Company for engaging in postclaims underwriting. Postclaims underwriting is a practice by which insurance companies fail to conduct underwriting before accepting insurance applications but seek to find grounds to rescind health insurance policies when a claim for payment is submitted by the patient or doctor.

Mr. Friedman currently represents plaintiffs in a class action against Magellan and Blue Shield of California for violation of ERISA arising out of defendants' denial or reduction in hours of Applied Behavior Analysis ("ABA") for the treatment of Autistic Spectrum Disorder ("ASD"). Plaintiffs allege that Defendants breached their fiduciary duties by adopting and utilizing medical necessity criteria and claims determination guidelines that are far more restrictive than those that are generally accepted medical practice for the treatment of ASD by the mental health community and the prevailing well-documented scientific research.

Civil Rights

Mr. Friedman and the firm, along with several other law firms, have represented African-American policy holders in class action proceedings against life insurance companies seeking relief under the Federal Civil Rights Act for racial discrimination in the sale and administration of life insurance policies. For many decades, life insurance companies routinely charged higher premiums to non-Caucasians for inferior life insurance policies. The first such action, against *American General Life & Accident Company*, resulted in a $250 million settlement providing benefits that included cash refunds, increased death benefits and reduced future premiums. Mr. Friedman and the firm also represent plaintiffs in similar race discrimination class actions against other life insurance companies, including *Metropolitan Life*, *Liberty National*, *American National*, *Monumental Life*, *Western & Southern Life* and *Jefferson-Pilot Life Insurance Company*.

Mr. Friedman served as lead or co-lead counsel in many other actions seeking to hold financial institutions responsible for racial discrimination against minorities. He served as co-lead counsel on behalf of proposed classes of African-American and Latino borrowers asserting claims against mortgage lenders for racial discrimination in violation of the Equal Credit Opportunity Act and the Fair Housing Act. The bank defendants in these actions, among others, include: *Countrywide Financial Corporation; Wells Fargo Bank, N.A.; GreenPoint Mortgage Funding, Inc.; GE Money Bank; First Franklin Financial Corp.; JP Morgan Chase & Chase Bank, U.S.A., N.A.; H&R Block, Inc.; IndyMac Bank, F.S.B.; HSBC Finance Co.,* and *Option One Mortgage Co.* Mr. Friedman also has represented Plaintiffs in cases challenging the use of credit scoring by insurance companies and lenders in a manner that adversely impacts minority consumers.

Data Breach Litigation

Mr. Friedman and other lawyers of the firm have represented consumers and health care patients in cases arising from cyber-attacks against companies resulting in the theft of personal information, including credit card and personal health information.

Mr. Friedman represented the Chapter 7 trustee for CardSystems Solutions, Inc. in two separate actions in the Pima County Superior Court. CardSystems was a major credit and debit card processor that collapsed into bankruptcy in 2006. CardSystems failed to properly encrypt credit card data and was the victim of a hacking intrusion resulting in the disclosure of confidential information and identity theft. The CardSystems security breach, which was the largest reported breach of personal data (exposing as many as 40 million credit cards), sparked a national scandal and hearings before the U.S. Senate. After obtaining a judgment against former officers of CardSystems in the amount of $7.5 million, Mr. Friedman represented the bankruptcy trustee in an action against the insurance company and ultimately secured a payment of $1.25 million.

Professional Associations

Mr. Friedman has lectured at numerous continuing legal education programs, including panel discussions and presentations on the Private Securities Litigation Reform Act (1996 Federal Bar Convention), prosecution of nationwide class actions in state courts (1996 ABA Annual Convention), litigation of life insurance market conduct cases (1997, 1999 and 2000 PLI conferences), class action best practices (2011 Arizona State Bar), consumer rights litigation (2008), the Arizona Securities Act (2013 Arizona State Bar), mediation of complex cases (2016 American Bar Association) and other litigation programs sponsored by the Practicing Law Institute, ALI-ABA, American Bar Association, National Academy of Elder Law Attorneys .

Mr. Friedman testified before the U.S. Congress in connection with proposed legislation to limit the rights of consumers in class action cases. He also has testified before the Arizona Legislature in connection with legislation on the Arizona Anti-Racketeering Act, the Arizona Securities Fraud Act and proposed legislation to limit the ability of consumers to obtain relief through class actions.

Mr. Friedman received his Bachelor of Arts Degree from the University of Rochester in 1975 (high distinction) and his Law Degree from Duke University School of Law in 1978 (Order of the Coif, high distinction). He serves as a Board member of Public Justice, a public interest organization and is also a member of the American Association of Justice and Consumer Attorneys of California. Mr. Friedman was a finalist for the Public Justice Trial Lawyer of the Year in 2008 and a finalist for the CAOC Consumer Attorney of the Year in 2009.

Mr. Friedman served as a Board member of the Public Justice Foundation and currently serves as a Board member of Public Citizen. Mr. Friedman has performed *pro bono* services on behalf of non-profit organizations, including the Jewish Children and Family Services and private litigants.

Mr. Friedman is a founding member of Bonnett Fairbourn Friedman & Balint.



FRANCIS J. BALINT, JR.'s practice focuses on consumer class action litigation, qui tam actions under the federal False Claims Act, insurance coverage and defense matters, and appellate work. He has represented clients in class litigation involving federal and state securities laws, deceptive insurance sales practices, and other consumer claims.

In particular, Mr. Balint served as counsel for the relator in *Todarello v. Beverly Enterprises*, (D. Ariz. & N.D. Cal.) a qui tam action which led to a recovery by the United States Government of $170 million. Successful appellate decisions include: *Atchison, Topeka and Santa Fe Ry. Co. v. Brown & Bryant*, Inc., 159 F.3d 358 (9th Cir. [Cal.] Oct. 14, 1998); *Taylor AG Industries v. Pure-Gro*, 54 F.3d 555 (9th Cir. [Ariz.], Apr. 24, 1995); *Ranch 57 v. City of Yuma*, 152 Ariz. 218, 731 P.2d 113 (Ariz. App. Div. 1, Sept. 2, 1986).

Mr. Balint served as co-counsel for the Lead Plaintiffs and the investor class in the litigation arising out of the collapse of the Baptist Foundation of Arizona, the largest charitable institution fraud case in United States history. The recovery achieved for investors, after four years of highly adversarial litigation, exceeded $250 million.

Mr. Balint also served as co-counsel for the Lead Plaintiff, the Policemen's Annuity and Benefit Fund of Chicago, and a class of shareholders seeking relief under Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5. *In re Apollo Group, Inc.*, CV-04-2147-PHX-JAT (D. Ariz.) was one of only six such cases to have been taken to trial since the passage of the PSLRA. Lead Plaintiff successfully obtained a verdict of approximately $275 million for Apollo shareholders.

Mr. Balint also served as co-counsel for the class of policyowners in successive class actions seeking relief from so-called "cost of insurance" ("COI") increases brought and favorably resolved in *Feller, et al. v. Transamerica Life Insurance Company*, and *Thompson, et al. v. Transamerica Life Insurance Company*. Plaintiffs in these actions alleged that the COI increases implemented by Transamerica breached a uniform, express contractual term in the standardized Policies prohibiting COI increases that recoup past losses. The district court in *Feller* certified a nationwide class of policyholders and a California state law class of policyholders. A settlement was ultimately reached which included a monetary payment to class members and a five-year moratorium on any future COI increases. The monetary relief provided under the settlement totaled over $100 million. The *Thompson* action too was ultimately settled, with class monetary relief of approximately $96 million and a seven-year moratorium.

Other class action cases which Mr. Balint has litigated include *Cheatham v. ADT LLC* (Consumer Protection); *Harshbarger v. The Penn Mutual Life Insurance Company* (Policyholder Protection); *Bacchi v. Massachusetts Mutual Life Insurance Company* (Policyholder Protection); *The Apple iPod iTunes Anti-Trust Litigation* (Antitrust); *Facciola v. Greenberg Traurig* (Securities Fraud); *In Re: Prudential Insurance Company of America SGLI/VGLI Contract Litigation* (Policyholder Protection); *Yue v. Conseco Life Insurance Company* (Policyholder Protection); *Orthologic Securities Fraud Litigation*. (Securities Fraud); *In re Skymall* (Securities Fraud); *Rogers v. American Family* (Policyholder Protection); *Foster v. 1st Global Capital, LLC* (Securities Fraud); *Durkee v. Alaska Airlines* (Travel Insurance); and *Fruitstone v. Spartan Race Inc.* (Consumer Protection).

Mr. Balint has in particular frequently assisted individual policyholders in securing relief from their insurance and mortgage servicing companies, including in *Zhou v. Security Life of Denver Insurance Company* (underpaid interest on pre-issuance premium payments), *LSCC v. Wilco Life Insurance Company* (underpaid benefits under earlier class settlement agreement); *Labrecque v. NewRez LLC* (RESPA enforcement).

Mr. Balint has also represented individual clients in numerous disputes successfully resolved without the need for litigation, both as potential plaintiffs and potential defendants.

Mr. Balint is a former President of the Arizona Association of Defense Counsel (1999-2000), a former member of its board of directors and former chairman of its Amicus Committee.

Mr. Balint received his Bachelor of Arts Degree with high distinction from the University of Virginia in 1979. He received his law degree in 1982 from the University of Virginia. Mr. Balint was admitted to the Bar in the Commonwealth of Virginia in 1982, the District of Columbia in 1982, the State of Arizona in 1983, and the Commonwealth of Massachusetts in 2010; he is admitted to practice before the U.S. Supreme Court, the U.S. Court of Appeals for the Fourth, Fifth, Seventh, Ninth and Tenth Circuits, and the U.S. District Court for the District of Arizona, the District of Colorado, the Eastern District of Virginia, the Central District of Illinois and the District of Massachusetts.

Mr. Balint was a sole practitioner in Virginia for a short period of time before becoming associated with Evans, Kitchel & Jenkes, P.C., a large Phoenix law firm. In 1984, Mr. Balint became a founding member of Bonnett Fairbourn Friedman & Balint, PC.

EXHIBIT 3

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WILLIAM F. WREN and JOHN MURPHY, on behalf of themselves and others similarly situated Plaintiffs,	Case No. 5:21-cv-00178-JGB-SP **SETTLEMENT AGREEMENT AND RELEASE**

vs.

TRANSAMERICA LIFE INSURANCE COMPANY,

Defendant.

Subject to Court approval and pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs William F. Wren and John Murphy, individually and as Class Representatives on behalf of the proposed Settlement Class, and Defendant Transamerica Life Insurance Company ("TLIC"), through their respective undersigned counsel and/or authorized representatives, enter into this Settlement Agreement and Release. All capitalized terms have the definitions set forth in Section II.

I. INTRODUCTION

A. The Action and the Underlying Allegations

1. William F. Wren filed a putative class action against TLIC in the Central District of California on February 1, 2021, challenging TLIC's refusal to credit certain Cash Value Increases and its good faith in connection with the same.

2. On June 4, 2021, TLIC filed its Answer and Affirmative Defenses to Plaintiff's Class Action Complaint and Demand for Jury Trial, denying Plaintiff's allegations. (ECF No. 31).

3. On April 4, 2025, Plaintiffs William F. Wren and John Murphy filed their Amended Class Action Complaint ("Amended Complaint"), challenging TLIC's refusal to credit certain Cash Value Increases and its good faith in connection with the same, and adding John Murphy as an additional named plaintiff. (ECF No. 131).

4. TLIC filed its Answer and Affirmative Defenses to the Amended Complaint on May 5, 2025, denying Plaintiffs' allegations. (ECF No. 132).

5. On May 20, 2025, the Parties filed a Joint Stipulation Re: Corrected First Amended

Complaint. (ECF No. 133).

6. On June 4, 2025, the Court entered an Order granting Plaintiffs leave to file the Corrected First Amended Complaint. (ECF No. 139).

7. On June 4, 2025, Plaintiffs filed their Corrected Amended Class Action Complaint, challenging TLIC's refusal to credit certain Cash Value Increases and its good faith in connection with the same. (ECF No. 140).

8. On June 17, 2025, TLIC filed its Answer and Affirmative Defenses to Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy. (ECF No. 145).

B. Settlement Background

9. This settlement was reached through arms-length negotiations between Class Counsel and TLIC's Counsel with the assistance of experienced class action mediator Robert Meyer, Esq., with JAMS. An in-person mediation was conducted before Mr. Meyer on October 9, 2025 with representatives for TLIC attending. The Parties ended the mediation that day by scheduling a second day of mediation on January 12, 2026. During that second day of mediation, the Parties reached a settlement on behalf of a proposed settlement class of TLIC policyowners.

10. The Parties executed this Settlement Agreement memorializing the terms of the proposed settlement.

11. Before executing the Settlement Agreement, Plaintiffs, through Class Counsel and their experts, conducted extensive formal discovery and a thorough investigation of the claims, defenses, and underlying events and transactions that are the subject of the Action. The investigation included, among other things: (i) review and analysis of the evidence and applicable law, including the review and analysis of a substantial number of documents, emails, and native files produced by TLIC; (ii) consultation with actuarial and other experts retained by Class

Counsel; and (iii) taking and defending numerous depositions.

12. Class Counsel has thoroughly evaluated the relevant law and facts to assess the merits of the claims alleged in the Action. Based upon their extensive discovery, investigation, and evaluation of the facts and law applicable to the Cash Value Increases, Class Counsel recommends approval of the settlement of the Action pursuant to the terms of this Settlement Agreement, after considering, among other things: (a) the fairness, reasonableness, and adequacy of this settlement; (b) the procedural posture of the litigation and substantial risks and uncertainties of trial and appeal, especially in a complex class action such as this challenging TLIC's decision not to credit the Cash Value Increases, as well as the difficulties, delays, and risks of adverse results inherent in trial and appeal; (c) the needs and interests of the Settlement Class Members; and (d) the desirability of consummating this Settlement Agreement promptly, in order to provide timely substantial relief to those Settlement Class Members.

13. Class Counsel agrees that this Settlement Agreement is fair, reasonable, and adequate, because, among other things, it provides $110 million in immediate cash payments to the Settlement Class, secures TLIC's commitment to credit 40-Year Guaranteed CVIs for Policies that are in force on the date of their 40th anniversaries, and is otherwise in the best interests of the Settlement Class by fairly resolving the claims alleged in the Action.

14. TLIC denies any and all allegations of wrongdoing and does not admit or concede any actual or potential fault, wrongdoing, liability, or damage of any kind to Plaintiffs or to the Settlement Class in connection with any facts or claims that have been or could have been alleged against them arising from the factual allegations in the Action. TLIC denies that it acted improperly or wrongfully in any way and believes that the claims asserted in the Action have no merit. TLIC further contends that its decision not to credit the Cash Value Increases was, at all times, in accordance with the Policies' terms, the terms of the *Oakes* Settlement, and accepted

actuarial standards.

15. TLIC considers it desirable for the Action to be settled and dismissed on terms which will: (i) provide substantial benefits to the Settlement Class; (ii) finally put to rest the claims of the Plaintiffs and the Settlement Class and the underlying dispute; and (iii) avoid the substantial expense, burdens, risks, and uncertainties associated with trial and appeal of the Action.

II. DEFINITIONS AND CONVENTIONS

For the purposes of this Settlement Agreement:

16. "30-Year Anniversary" means the 30th anniversary of the Coverage Effective Date as reflected in the Policies.

17. "30-Year Guaranteed CVI" means the Guaranteed CVI for the 30-Year Anniversary of a DRL Policy, as reflected in Interrogatory Response Appendix A as "30Y G Bonus."

18. "30-Year Non-Guaranteed CVI" means the CVI for the 30-Year Anniversary of a DRL Policy that a Covered Participant's Issue Illustration did not describe as "guaranteed," as reflected in Interrogatory Response Appendix A as "30Y NG Bonus."

19. "40-Year Anniversary" means the 40th anniversary of the Coverage Effective Date as reflected in the Policies.

20. "40-Year Guaranteed CVI" means the Guaranteed CVI for the 40-Year Anniversary of an in-force DRL Policy, as reflected in Interrogatory Response Appendix A as "40Y G Bonus."

21. "Action" means the above-captioned action, styled *William F. Wren and John Murphy v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP, currently pending in the U.S. District Court for the Central District of California and assigned to The Honorable Jesus G. Bernal.

22. "Bonus Crediting Project" means the project that TLIC undertook in 2025 and 2026 as a result of this litigation under which it credited or will credit 30-Year Guaranteed CVIs to certain inforce DRL Policies, and also will credit the 40-Year Guaranteed CVIs to those DRL Policies, if applicable, provided each such Policy remains inforce on its 40-Year Anniversary.

23. "CAC" means the Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy filed in the Action on June 4, 2025.

24. "Cash Value Increase" or "CVI" means the increases to a DRL Policy's cash value, calculated as a percentage of the scheduled premiums paid during the DRL Policy's first ten years, using the percentages shown in a Covered Participant's Issue Illustration for a Policy's 20th, 30th, and/or 40th anniversary dates, if applicable, as reflected in Interrogatory Response Appendix A.

25. "Class Counsel" means Susman Godfrey L.L.P and Bonnett Fairbourn Friedman & Balint PC.

26. "Class Fee and Expense Application" means the application by Class Counsel for an award of attorneys' fees and expenses and reimbursement of Class Counsel's costs and expenses and Service Awards in accordance with Sections VIII and IX.

27. "Class Fee and Expense Order" means the Court's ruling on the contemplated Class Fee and Expense Application and request for Service Awards, as described in Sections VIII and IX.

28. "Class Representatives" means, collectively, William F. Wren and John Murphy.

29. "Confidential Information" means material designated as "Confidential" in accordance with the terms of the Protective Order entered in the Action (ECF No. 36).

30. "Confidential Termination Agreement" means the agreement between the Parties described in Section XI.

31. "Court" means the U.S. District Court for the Central District of California.

32. "Covered Participant" means an employee or member of an employer group, trade organization group, or other group that purchased a DRL Policy.

33. "Day" or "days" means a calendar day or days; provided however, that the computation of time periods under this Settlement Agreement will be made in accordance with the provisions of Section XII.

34. "DRL Issuer" means one of the following statutory insurance entities that issued DRL Policies: General Services Life Insurance Company, Bankers United Life Assurance Company, Pacific Fidelity Life Insurance Company, Western Reserve Life Insurance Company of Ohio, Monumental Life Insurance Company, or Monumental General Insurance Company.

35. "DRL Policy," "DRL Policies," "Policy," and "Policies" mean the form of group universal life insurance coverage that: (a) was owned by individual Settlement Class Members; (b) was in effect on January 1, 2016; (c) was known by the product names "Direct Recognition Life 10" or "Direct Recognition Life 11", or by the attribute codes "DRL-10" or "DRL-11"; and (d) was established and defined by the provisions of a Group Master Policy, Group Insurance Certificate, and Issue Illustration.

36. "Execution Date" means the date on which this Settlement Agreement is fully executed by the Parties.

37. "Fairness Hearing" means the hearing held by the Court on any motion for final approval of the proposed settlement following the entry of the Preliminary Approval Order and the Notice Date, for the purposes of: (a) determining whether the Settlement Agreement should be approved as fair, reasonable, adequate, and in the best interests of the Settlement Class Members; (b) determining that the Settlement Class should be certified pursuant to Federal Rule of Civil Procedure 23; (c) entering the Final Approval Order approving the Settlement Agreement and dismissing the Action with prejudice; (d) entering the Class Fee and Expense Order and approving

of Service Awards for Class Representatives; and (e) ruling on any other matters as may be raised before the Court.

38. "Final Approval Date" means the date on which the Court enters judgment on the Final Approval Order.

39. "Final Approval Order" means the Court's order fully and finally approving the Settlement Agreement, dismissing the Action with prejudice, and entering final judgment, as described in Section X. The proposed judgment to be submitted to the Court will include a provision for retention of the Court's jurisdiction over the Parties to enforce the terms of the judgment.

40. "Final Settlement Date" means the date on which the Court's judgment entered on the Final Approval Order under Federal Rule of Civil Procedure 58 becomes final. For purposes of this Settlement Agreement:

a. if no appeal is taken from the judgment entered upon the Final Approval Order, "Final Settlement Date" means the date on which the time to appeal therefrom has expired; or

b. if an appeal has been taken from the judgment entered upon the Final Approval Order, "Final Settlement Date" means the date on which all appeals therefrom, including petitions for rehearing or re-argument, petitions for rehearing *en banc*, and petitions for *certiorari* or any other form of review, have been fully disposed of in a manner that affirms the Final Approval Order.

41. "Final Settlement Fund" means the Settlement Fund less any proportionate reductions based on the Proportionate CVIs attributed to Policyowners who submit a Request for Exclusion pursuant to Section V of this Settlement Agreement.

42. "Guaranteed CVI" means the Cash Value Increase that a Covered Participant's

Issue Illustration described as "guaranteed."

43. "Group Insurance Certificate" is a document that evidences and establishes certain terms governing the universal life insurance coverage provided to a Covered Participant under a DRL Policy.

44. "Group Master Policy" is a document issued to an employer group, trade organization group, or other group that memorializes and establishes certain terms for the DRL Policies that the employers or groups purchased for their Covered Participants.

45. "Interrogatory Response Appendix A" means the Second Amended Appendix A to TLIC's Fourth Supplemental Objections and Responses to Plaintiff's Second Set of Interrogatories, served in this Action on October 13, 2025.

46. "Issue Illustration" means the life insurance illustration a DRL Issuer provided to a Covered Participant at or near the date the Covered Participant's DRL Policy was issued, which Illustrations typically identified themselves as "Issue Illustrations"[1] and listed the date of birth of the Covered Participant, as well as the Certificate Number, Group Number, Coverage Effective Date, and Certificate Issue Date associated with the Covered Participant's DRL Policy.

47. "Mediator" means Robert Meyer, Esq. of JAMS.

48. "Net Settlement Fund" means the Final Settlement Fund less: (i) Settlement Administration Expenses; (ii) any Service Awards; (iii) any Class Counsel's fees and expenses awarded by the Court pursuant to the Class Fee and Expense Order; and (iv) any other payments provided for under this Settlement Agreement or the Final Approval Order.

49. "Notice Date" means the date on which the Settlement Class Notice is mailed.

[1] For example, the Issue Illustrations issued to many of the Settlement Class members contained language similar to the following: "THIS ISSUE ILLUSTRATION IS ATTACHED AND MADE PART OF THE CERTIFICATE WHICH EVIDENCES INSURANCE UNDER THE GROUP MASTER POLICY AND ITS RIDERS."

50. "Notice List" means the list of Policyowners and their last known addresses to be provided by TLIC to the Settlement Administrator and to Class Counsel.

51. "Parties" means, collectively, Plaintiffs, on behalf of themselves and the Settlement Class, and TLIC.

52. "Parties' Counsel" means, collectively, Class Counsel and TLIC's Counsel.

53. "Plaintiffs" means, collectively, William F. Wren and John Murphy in their individual capacities.

54. "Plan of Allocation" means Class Counsel's proposed plan for disbursement of the Net Settlement Fund to Settlement Class Members, which is attached hereto as **Exhibit A**.

55. "Policyowner" means the individual or entity that is identified in TLIC's records as the "Owner" of a particular DRL Policy that was in force on January 1, 2016.

56. "Preliminary Approval Date" means the date on which the Court enters the Preliminary Approval Order.

57. "Preliminary Approval Order" means an order of the Court (1) preliminarily certifying the Settlement Class, appointing Class Representatives for the Settlement Class, appointing Class Counsel as counsel for the Settlement Class, and appointing the Settlement Administrator; (2) granting preliminary approval of the proposed settlement as appearing sufficiently fair, adequate, and reasonable to warrant the dissemination of Settlement Class Notice; and (3) setting a date for a Fairness Hearing.

58. "Proportionate CVIs" means each Policyowner's share of the total Unpaid 30-Year CVI Amount (as defined in Paragraph 2(a) of the Plan of Allocation) for the Settlement Class Policies, as calculated in Paragraph 2(b) of the Plan of Allocation.

59. "Request for Exclusion" means a properly completed and timely postmarked request from a Policyowner to be excluded from the Settlement Class, as described in Section V.

60. "Released Claims" has the meaning set forth in Section VII.

61. "Releasees" means, individually and collectively, TLIC, TLIC's past and present parents (including intermediate and ultimate parents), direct and indirect subsidiaries, affiliates, predecessors, joint ventures, successors and assigns, together with each of their past and present officers, directors, shareholders, employees, representatives, attorneys, general agents, agents, and producers (including, but not limited to, those acting on behalf of TLIC and within the scope of their agency), TLIC's Counsel, and all of such Releasees' heirs, administrators, executors, insurers, agents, representatives, employees, attorneys, predecessors, successors, and assigns, or any of them, and including any person or entity acting on behalf or at the direction of any of them.

62. "Releasors" means the Plaintiffs and each Settlement Class Member on behalf of themselves and their respective agents, heirs, relatives, representatives, attorneys, consultants, payors, trustees, grantors, subrogees, securities intermediaries, beneficial owners, entitlement holders, principals, employees, assigns, executors, beneficiaries, beneficiaries designated under the Settlement Class Policies, administrators, predecessors, and successors, and any other person or entity acting by, through, under, as successor-in-interest to, or in concert with any of them.

63. "Service Award" means the amount of an award approved by the Court to be paid from the Final Settlement Fund to each Class Representative to compensate such individuals or entities for efforts undertaken by them on behalf of the Settlement Class.

64. "Settlement Administration Expenses" means all Class Notice, Settlement Class Notice, and any other administrative fees, costs, or expenses incurred in administering the Class Notice, Settlement Class Notice, or Settlement, including those fees incurred by the Settlement Administrator. Settlement Administration Expenses shall be paid from the Final Settlement Fund.

65. "Settlement Administrator" means a third-party administrator of the settlement who is retained by Class Counsel and approved by the Court to assist with Settlement Class Notice and

administration of the settlement. The Settlement Administrator's fees shall be paid from the Final Settlement Fund.

66. "Settlement Agreement" means this Settlement Agreement and Release, including its exhibits.

67. "Settlement Class" means the following opt-out plaintiff settlement class to be requested to be certified by the Court pursuant to Federal Rule of Civil Procedure Rule 23(b)(3): all persons or entities who presently own or formerly owned a Settlement Class Policy that was in force during the Settlement Class Period. Excluded from the Settlement Class are: (a) the Honorable Jesus G. Bernal, U.S. District Court Judge of the Central District of California (or other Circuit, District, or Magistrate Judge presiding over the Action through which this matter is presented for settlement) and his immediate family; (b) TLIC; (c) any officer or director of TLIC reported in its most recent Annual Statements and members of their immediate families; (d) anyone employed in Class Counsel's firms; (e) Policyowners who properly execute and timely file a Request for Exclusion from the Settlement Class; (f) certain Policyowners whom TLIC has identified as not part of the Settlement Class pursuant to their prior confidential agreements with TLIC; and (g) the legal representatives, successors, or assigns of any of the foregoing excluded Policyowners (but only then in their capacity as legal representative, successor, or assignee).

68. "Settlement Class Members" means all Policyowners encompassed by the definition of the Settlement Class.

69. "Settlement Class Notice" means the notice concerning the proposed settlement to be sent to the Settlement Class, as described in Section IV.

70. "Settlement Class Period" means the period from January 1, 2016 through and including the Final Approval Date.

71. "Settlement Class Policy" or "Settlement Class Policies" means the DRL Policies

owned by Settlement Class Members, which were in force as of January 1, 2016, with the following Plan Codes and Product Codes:

PLAN CODE	PRODUCT CODE
D70001	DRL-10
D700S1	DRL-10
D700F1	DRL-10
D7000J	DRL-10
D700SJ	DRL-10
D700FJ	DRL-10
D7N001	DRL-10
D7N0S1	DRL-10
D7N0F1	DRL-10
D7N00J	DRL-10
D7N0SJ	DRL-10
D7N0FJ	DRL-10
D7I001	DRL-10
D7I0S1	DRL-10
D7I0F1	DRL-10
D7I0FJ	DRL-10
D7NK01	DRL-10
D7NKS1	DRL-10
D7NKF1	DRL-10
D7NK0J	DRL-10
D7NKSJ	DRL-10
D7NKFJ	DRL-10
D7IK01	DRL-10
D7IKS1	DRL-10
D7IKF1	DRL-10
D7IK0J	DRL-10
D7IKSJ	DRL-10
D7IKFJ	DRL-10
D80001	DRL-10
DN00J	DRL 10 /11
D7N2F1	DRL 10 /11
D7NZ01	DRL-11
D7NZS1	DRL-11
D7NZF1	DRL-11
D7NZ0J	DRL-11
D7NZSJ	DRL-11
D7NZFJ	DRL-11

D7IZ01	DRL-11
D7IZS1	DRL-11
D7IZF1	DRL-11
D7IZ0J	DRL-11

72. "Settlement Class Website" means the website set up by the Settlement Administrator concerning the Action.

73. "Settlement Fund" means a cash fund of ONE HUNDRED TEN MILLION DOLLARS ($110 million) consisting of the compensation paid for the benefit of the Settlement Class prior to any proportionate reduction for Policyowners who submit a properly completed and timely Request for Exclusion pursuant to Section V of this Settlement Agreement.

74. "Settlement Fund Account" means the escrow account where the Settlement Fund shall be held pending determination of the Final Settlement Fund and the Net Settlement Fund, and pending disbursement pursuant to the Preliminary Approval Order and Final Approval Order.

75. "Settlement Relief" means, collectively, all forms of relief made available to Settlement Class Members under this Settlement Agreement, as described in Section III, including the Settlement Fund, the 40-Year Guaranteed CVI Benefit, and the Non-Contestability Benefit.

76. "Statement of Objection" means a written objection by a Settlement Class Member timely filed with the Court, as described in Section VI.

77. "TLIC" means Defendant Transamerica Life Insurance Company and its respective predecessor and successor entities.

78. "TLIC's Counsel" means, collectively, the law firms of and lawyers at Chittenden, Murday & Novotny LLC and Maynard Nexsen LLP.

III. SETTLEMENT RELIEF

A. Cash Compensation to Settlement Class Members

79. Settlement Fund. By the latter of (a) 30 calendar days following entry of the

Preliminary Approval Order or (b) 30 calendar days following TLIC's receipt of all relevant account information and wiring instructions from or on behalf of the Settlement Administrator, TLIC will pay $110 million to the Settlement Fund Account to establish the Settlement Fund.

a. If the Court does not approve the Settlement Agreement through entry of a Final Approval Order, the Settlement Administrator shall refund the Settlement Fund to TLIC, together with all earnings thereon described in Paragraph 80, within seven business days following entry of any Court order denying final approval of the proposed settlement. Notwithstanding the foregoing, no Settlement Administration Expenses shall be recouped by TLIC if the Court does not approve the Settlement Agreement through entry of a Final Approval Order.

b. If the Final Approval Order and/or judgment are subject to appeal, the Settlement Fund shall remain in the Settlement Fund Account until resolution of any appeal.

80. The Settlement Fund Account. The Settlement Fund Account, and all earnings thereon, shall be deemed to be in *custodia legis* of the Court and shall remain subject to the jurisdiction of the Court until such time as the funds have been disbursed pursuant to the terms of this Settlement Agreement, the Final Approval Order, or by further Court order. The funds deposited in the Settlement Fund Account, which must be interest-bearing or otherwise generate interest, shall be invested in instruments, accounts, or funds backed by the full faith and credit of the U.S. Government or fully insured by the U.S. Government or an agency thereof. Such permissible investments include investments in a U.S. Treasury money market fund (*e.g.*, Vanguard Federal Money Market Investor Fund (VMFXX)) or a bank account that is either: (a) fully insured by the Federal Deposit Insurance Corporation; or (b) secured by instruments backed by the full faith and credit of the U.S. Government. The Parties and the Parties' Counsel shall have no responsibility or liability whatsoever with respect to investment decisions made for the

Settlement Fund Account. All risk related to the investment of the Settlement Fund shall be borne solely by the Settlement Class.

81. Proportionate Reduction of Settlement Fund. The amount of the Settlement Fund and all earnings thereon will be proportionately reduced based on the aggregate Proportionate CVIs of all Policyowners who submit a valid Request for Exclusion from the Settlement Class pursuant to Section V.[2] This reduced amount constitutes the Final Settlement Fund. Any disputes between or among the Parties regarding any reductions to the Settlement Fund shall be first presented to the Mediator for potential resolution and, absent resolution, to the Court for a determination. The Parties each represent and warrant that neither is aware of any person or entity that intends to submit a Request for Exclusion from the Settlement Class and agree not to solicit or encourage any such submissions. Within seven business days following entry of the Final Approval Order, the Settlement Administrator shall disburse the difference, if any, between the Settlement Fund and the Final Settlement Fund to TLIC.

82. Plan of Allocation for Net Settlement Fund. The amount of cash Settlement Relief to be distributed to Settlement Class Members constitutes the Net Settlement Fund. Class Counsel is responsible for developing the Plan of Allocation, which in turn is subject to Court approval, and is attached hereto as **Exhibit A**.

83. Distribution of Net Settlement Fund. The Settlement Administrator shall effectuate distribution of each Settlement Class Member's share of the Net Settlement Fund by check mailed to each Settlement Class Member, consistent with any Court-approved Plan of Allocation.

84. TLIC shall not be required to make any payments in connection with this Action

[2] For example, if Policies with total Proportionate CVIs of 5% are excluded from the Settlement Class, then the Settlement Fund would be reduced by 5%, from $110 million to $104.5 million.

other than as described in Paragraph 79.

B. Non-Cash Compensation to Settlement Class Members

85. Nonreversion. There will be no reversion of the Final Settlement Fund to TLIC. If any amount of the Net Settlement Fund is unclaimed or unpayable after reasonable efforts to locate and pay such Settlement Class Members have been exhausted, including through any additional distributions to Settlement Class Members authorized in the Court-approved Plan of Allocation, then Plaintiffs shall petition the Court for approval of the proposed manner in which remaining unclaimed or unpayable amounts will be distributed.

86. Bonus Crediting Project. TLIC agrees that it will not rescind, revoke, or reverse the credits that it has made, and has committed to make, pursuant to the Bonus Crediting Project.

87. 40-Year Guaranteed CVI Benefit. TLIC agrees that it will credit the 40-Year Guaranteed CVI for each DRL Policy that is or was included in the Bonus Crediting Project, if applicable, provided each such Policy remains inforce on its 40-Year Anniversary.

88. Non-Contestability Benefit. TLIC agrees it will not seek to void, rescind, cancel, have declared void, or otherwise deny coverage of death claims submitted by Settlement Class Members based on any alleged lack of insurable interest or misrepresentations made in connection with the original application process (the "Non-Contestability Benefit"). The Non-Contestability Benefit does not apply to any alleged lack of insurable interest or misrepresentations made in connection with an application to reinstate coverage. The covenant set forth in this Paragraph is solely prospective and does not apply to any actions taken by TLIC in the past. Nothing contained in this Settlement Agreement shall otherwise restrict TLIC from: (i) following its normal procedures and any applicable legal requirements regarding claims processing, including but not limited to confirming the death of the insured; determining the proper beneficiary to whom payment should be made in accordance with applicable laws, the terms of the Settlement Class

Policy, and Settlement Class Policy specific documents filed with TLIC; and investigating and responding to competing claims for death benefits; (ii) enforcing contract terms and applicable laws with respect to misstatements regarding the age, gender, or smoking status of the insured; (iii) in the event any Settlement Class Member initiates after the Final Approval Date a legal proceeding concerning any Released Claim, asserting any affirmative defenses or counterclaim in such litigation; or (iv) complying with any court order, law or regulatory requirements or requests, including but not limited to, compliance with regulations relating to the Office of Foreign Asset Control, Financial Industry Regulatory Authority, and Financial Crimes Enforcement Network.

89. Status Quo Regarding Premium Obligations for Active Policies. The Parties agree that this Settlement Agreement does not alter the status quo with respect to Policyowners' ongoing obligations, if any, to pay premiums on their DRL Policies that remain active as of the date of this Settlement Agreement. For the avoidance of doubt, with respect to Plaintiff William F. Wren's policy, 000G016164, the status quo is that the policy is fully paid up and no future premiums are required.

IV. NOTICE TO THE SETTLEMENT CLASS AND COMMUNICATIONS WITH SETTLEMENT CLASS MEMBERS

A. Preliminary Approval by the Court

90. As soon as reasonably practicable following the Execution Date, Plaintiffs will submit the proposed settlement to the Court and request the entry of the Preliminary Approval Order (a) preliminarily certifying the Settlement Class, appointing Class Representatives for the Settlement Class, appointing Class Counsel as counsel for the Settlement Class, and appointing the Settlement Administrator, (b) preliminarily approving the proposed settlement as appearing sufficiently fair, adequate, and reasonable to warrant the dissemination of Settlement Class Notice, and (c) setting a date for a Fairness Hearing. Plaintiffs will share a draft of the motion seeking

preliminary approval of the settlement with TLIC at least three business days before the motion is filed.

B. Settlement Class Notice

91. Subject to the requirements of any orders entered by the Court, and no later than 28 days after the Preliminary Approval Date, the Settlement Administrator will send Settlement Class Notice by first-class mail to the last known address in TLIC's records for each reasonably-identifiable person and/or entity in the Settlement Class, as well as publication notice through the Settlement Class Website established by the Settlement Administrator. The Settlement Class Notice will consist of the content described in Paragraph 93 below.

92. The mere mailing of Settlement Class Notice to a person or entity that is not in the Settlement Class, as defined herein, will not render such person or entity a part of the Settlement Class or otherwise entitle such person to participate in this settlement.

C. Settlement Class Notice Content

93. The Settlement Class Notice to be submitted to the Court for approval shall:

a. contain a short, plain statement of the background of the Action and the proposed settlement;

b. describe the category of persons and entities in the Settlement Class and inform such persons and entities that if they do not exclude themselves from the Settlement Class they may be eligible to receive relief under the proposed settlement;

c. describe the proposed Settlement Relief;

d. explain the impact of the proposed settlement on the pending Action;

e. describe the effect of the release included in the proposed settlement;

f. state that any relief to Settlement Class Members is contingent on the Court's final approval of the proposed Settlement Agreement as fair, reasonable, and adequate;

g. explain that a Settlement Class Member may request exclusion from the Settlement Class by mailing a written Request for Exclusion to the Settlement Administrator postmarked no later than 45 days after the Notice Date, or such other deadline approved by the Court;

h. explain that a Settlement Class Member who has not submitted a written Request for Exclusion may, if he or she desires, object to the proposed settlement by filing a written statement of objections with the Court and serving such written objection on counsel for the respective Parties (as identified in the Settlement Class Notice) no later than 45 days after the Notice Date, or as otherwise determined by the Court;

i. explain that a Settlement Class Member who has filed a timely and proper objection to the proposed settlement may appear at the Fairness Hearing, either personally or through counsel, provided that notice of the intention to appear is filed with the Court no later than 14 days before the Fairness Hearing, or as otherwise determined by the Court;

j. explain that any judgment entered in the Action, whether favorable or unfavorable to the Settlement Class, will include and be binding on all Settlement Class Members even if they have objected to Court approval of the proposed Settlement Agreement;

k. explain that a Settlement Class Member should consult their own tax advisors regarding the tax consequences of the proposed settlement, including but not limited to, any payments and payment periods provided hereunder, and any tax reporting obligations they may have with respect thereto; and

l. explain the provisions of this Settlement Agreement relating to attorneys' fees, expenses, and Service Awards including those in Sections VIII and IX, and explain

that individual Settlement Class Members will be responsible themselves for the fees and costs of any persons they may retain to represent them for any reason, including, but not limited to, counsel retained in connection with the filing of an objection or attendance at the Fairness Hearing.

94. The Settlement Class Notice will conform to the manner and form agreed on by the Parties and approved by the Court. The proposed form of the Settlement Class Notice as agreed on by the Parties is attached hereto as **Exhibits B and C**.

95. Class Counsel will also publish the Settlement Class Notice through the Settlement Class Website with more information and links to important documents relating to the Action and the proposed settlement. The costs of the establishment and maintenance of the Settlement Class Website are considered Settlement Administration Expenses.

D. Address Verification; Re-mailing

96. Prior to the mailing of the Settlement Class Notice, the Settlement Administrator will run the mailing list for the Class Notice through the U.S. Postal Service's National Change of Address Database for verification and correction of addresses to attempt to reduce the number of returned mail items. In the case of Settlement Class Notices undelivered and returned by the U.S. Postal Service, the Settlement Administrator will: (a) re-mail any Settlement Class Notice so returned with a forwarding address, and (b) (1) make reasonable efforts to attempt to find an address for any returned Settlement Class Notice that does not include a forwarding address, or (2) retain a commercial address verification service for this purpose. The Settlement Administrator will re-mail the Settlement Class Notice to each person and entity in the Settlement Class for which it or the address research service provides an updated address. All costs associated with the verification and correction of the mailing list for the Class Notice, any re-mailing of any Settlement Class Notice, and any efforts to attempt to find an address for any returned Settlement Class Notice

that does not include a forwarding address, including the costs associated with the retention of a commercial address verification service, are Settlement Administration Expenses.

E. Notice Under the Class Action Fairness Act

97. Within 10 days following the filing of this Settlement Agreement for preliminary approval by the Court, TLIC will serve notices of the proposed settlement upon the appropriate officials in compliance with the requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715. The cost of any CAFA notice is the sole responsibility of TLIC and will not be paid from the Settlement Fund.

F. Communication with Settlement Class Members, Claimants, and Policyowners

98. TLIC will not be privy to or respond to inquiries between Settlement Class Members and their counsel (including Class Counsel) regarding the Action or the Settlement Relief. However, TLIC reserves the right to communicate with, and to respond to inquiries directed to it from or on behalf of, insureds, beneficiaries, Policyowners, and Settlement Class Members, orally and/or in writing, regarding matters not involving the Action or the proposed settlement in the normal course of administering the Settlement Class Policies or otherwise in the ordinary course of business, and may do so through any appropriate agents or agencies. If, however, TLIC receives any inquiry from a Settlement Class Member specifically relating to the Action or the Settlement Agreement, TLIC will refer the Settlement Class Member to Class Counsel and/or the Settlement Administrator. Nothing in this Paragraph will preclude TLIC or TLIC's Counsel from communicating with an attorney representing any Policyowner.

99. TLIC may continue to process and respond to insured, beneficiary, or Policyowner complaints, including complaints submitted to TLIC by regulators, notwithstanding that some complaints may originate with Settlement Class Members and may concern claims relating to

Settlement Class Policies that otherwise could be eligible for Settlement Relief under the Settlement Agreement. In addition, TLIC will refer the Settlement Class Member to Class Counsel and/or the Settlement Administrator. Nothing within this Paragraph shall apply to Policyowners who file a timely and proper written Request for Exclusion in accordance with Section V.

V. REQUESTS FOR EXCLUSION

100. Any Policyowner that wishes to be excluded from the Settlement Class must submit to the Settlement Administrator a written Request for Exclusion sent by U.S. mail and postmarked no later than 45 days from the Notice Date, or any other deadline so ordered by the Court. Class Counsel will file a list of all valid Requests for Exclusion with the Court 14 days prior to the Fairness Hearing.

101. To be in proper form, subject to Court approval, the Request for Exclusion must include: (a) the name of the Action: *William F. Wren and John Murphy, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP, pending in the United States District Court for the Central District of California; (b) the full name of the person requesting exclusion, the Policyowner name(s), mailing address, email address (optional), and telephone number; (c) the Certificate Number(s) of the Policy(ies) to be excluded from the Settlement Class; (d) the personal signature of all Policyowners; and (e) the words "Request for Exclusion" or a clear and similar statement that the Policyowner(s) does not want to participate in the settlement. If there are multiple Policyowners with respect to a single Policy (such as spouses), all Policyowners must sign the Request for Exclusion unless the signatory holds and submits a copy of a valid power of attorney to act on behalf of all Policyowners.

102. A Policyowner who owns multiple Policies cannot exclude fewer than all Policies owned. If a Policyowner who owns multiple Policies submits a Request for Exclusion for fewer than all Policies owned, that Request will serve to exclude all Policies owned, but the Request for

Exclusion must still list all Policies. However, a Policyowner who owns multiple Policies in a representative or agency capacity (such as a trustee, securities intermediary, or other similar agency) for more than one principal may request to exclude Policies held on behalf of one principal while participating in the settlement with respect to Settlement Class Policies held by other principals.

103. If the Settlement Administrator determines that a person or entity submitting a Request for Exclusion with respect to a Policy is not the same person or entity reflected in the Notice List, then the Settlement Administrator shall require the person or entity submitting the Request for Exclusion to provide proof of ownership of the Policy or Policies in question. If proof of ownership is provided, the Settlement Administrator must provide notice to Class Counsel and TLIC's Counsel. The Parties and their Counsel will jointly determine whether sufficient proof of ownership was provided. The Court shall resolve any disputes of ownership or exclusion that cannot be reasonably resolved by the Parties and the Parties' Counsel.

104. The Settlement Administrator will maintain the Post Office Box to which Requests for Exclusion are required to be sent, monitor exclusion requests for accuracy and completeness, request any needed clarifications, and will timely provide copies of all such materials to Class Counsel and TLIC's Counsel.

105. Every Settlement Class Member that does not file a timely and proper written Request for Exclusion in accordance with this Section V will be bound by all subsequent proceedings, orders, and judgments in the Action.

VI. OBJECTIONS TO THE SETTLEMENT

106. Any Settlement Class Member that has not filed a timely and proper written Request for Exclusion and that wishes to object to the fairness, reasonableness, or adequacy of the proposed settlement must file with the Court a statement of objection ("Statement of Objection")

and serve such written objections on counsel for the respective Parties (as identified in the Settlement Class Notice) within 45 days after the Notice Date, or as otherwise determined by the Court.

107. To be in proper form, the Statement of Objection must include: (a) the name of the Action: *William F. Wren and John Murphy, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP, pending in the United States District Court for the Central District of California; (b) the full name of the person filing the Statement of Objection, the Settlement Class Member's name(s), mailing address, email address (optional), and telephone number; (c) the relevant Certificate Number(s); (d) the personal signature of all Settlement Class Members; (e) a statement that the Settlement Class Member objects to the settlement, in whole or in part; (f) an explanation of the legal and factual basis for the objection; (g) copies of any papers, briefs, or other documents upon which the objection is based; (h) a list of all persons who will be called to testify in support of the objection, if any; and (i) a statement of whether the Settlement Class Member intends to appear at the Fairness Hearing, and if represented by counsel, the identity of all attorneys representing the objecting Settlement Class Member. If there are multiple Policyowners with respect to a single Settlement Class Policy (such as spouses), all Settlement Class Members must sign the Statement of Objection unless the signatory holds and submits a copy of a valid power of attorney to act on behalf of all Policyowners of the Settlement Class Policy.

108. Any Settlement Class Member who timely files a proper written Statement of Objection in accordance with Paragraph 107 may appear at the Fairness Hearing in support of the objection. If a Settlement Class Member is represented by counsel as identified in the Statement of Objection, the attorney must file a notice of appearance with the Clerk of the Court no later than 14 days before the Fairness Hearing, or any other date required by the Court. A Settlement Class Member who appears at the Fairness Hearing by counsel or otherwise will be permitted to argue

only those matters that were set forth in the written Statement of Objection filed by such Settlement Class Member in accordance with this Section VI. No Settlement Class Member will be permitted to raise matters at the Fairness Hearing that the Settlement Class Member could have raised in such a written Statement of Objection but failed to do so, and any objection to the settlement that is not set forth in such a written Statement of Objection is deemed waived. Any Settlement Class Member who fails to comply with the applicable provisions of this Settlement Agreement and the Class Notice, and as otherwise ordered by the Court, will not be permitted to appear at the Fairness Hearing.

109. Any Settlement Class Member who fails to comply with the provisions of this Section VI will waive and forfeit any and all rights he, she, or it may have to appear separately and/or object to the settlement, and will be bound by all the terms of this Settlement Agreement and by all proceedings, orders, and judgments in the Action.

110. A Settlement Class Member's objection to the settlement will not affect his or her rights to participate in the Settlement Relief.

111. The Parties may serve and file responses to written objections at least 14 days prior to the Fairness Hearing, or as otherwise directed by the Court.

112. The Settlement Class Notice shall advise Settlement Class Members of their rights to object to the settlement and the manner required to do so pursuant to the provisions in this Settlement Agreement.

VII. RELEASES AND WAIVERS

113. In consideration of the promises and covenants of settlement between and among the Parties and as further contained in this Settlement Agreement (including, but not limited to, the compensation to Settlement Class Members), the Releasors hereby expressly release and discharge Releasees from and against any and all claims, causes of action, debts, liabilities,

damages, restitution, equitable, legal and administrative relief, known and unknown, at law or in equity, whether brought directly or indirectly, including any further claim to recovery or relief as a result of action by any state or federal government agency, which the Releasors ever had, now have or hereafter may have against the Releasees, from the beginning of time through the Final Settlement Date, arising out of or relating to TLIC's refusal to credit the Settlement Class Policies' Cash Value Increases and its good faith in connection with the same, and including any claims or causes of action that were or could have been alleged in the CAC that are based on the same factual predicate (collectively and together with the provisions in Paragraph 116, the "Released Claims"). Releasors hereby expressly further agree that they will not now or hereafter institute, maintain, assert, join, or participate in, either directly or indirectly, on their own behalf, on behalf of a class, or on behalf of any other person or entity, any action or proceeding of any kind against Releasees asserting the foregoing Released Claims. Notwithstanding the foregoing, Released Claims do not include (a) any claim for payment of a death benefit other than any claim for any unpaid CVIs as a portion of a death benefit; (b) any claims or rights to otherwise enforce the terms of a DRL Policy unrelated to the Cash Value Increases; or (c) any claims to enforce the settlement. Further, to the extent that a Settlement Class Member owns insurance policies issued by TLIC other than the Settlement Class Policies, this release, and the terms of this Settlement Agreement, shall not limit or otherwise affect in any way the rights of that Settlement Class Member with respect to such policies.

114. In consideration of the promises and covenants of settlement between and among the Parties and as further contained in this Settlement Agreement, the Releasors hereby expressly prospectively release and discharge Releasees from and against any and all claims, causes of action, debts, liabilities, damages, restitution, equitable, legal and administrative relief, known and unknown, at law or in equity, whether brought directly or indirectly, including any future claim to

recovery or relief as a result of action by any state or federal government agency, which the Releasors may hereafter have against the Releasees, from the Final Settlement Date through the end of time, arising out of or relating to the Cash Value Increases for the Settlement Class Policies.

115. In consideration of the promises and covenants of settlement between and among the Parties and as further contained in this Settlement Agreement (including but not limited to, the compensation to Settlement Class Members), TLIC hereby expressly releases and discharges Plaintiffs, Class Counsel, and Settlement Class Members from and against any and all claims, causes of action, debts, liabilities, damages, restitution, equitable, legal and administrative relief, known and unknown, at law or in equity, whether brought directly or indirectly, arising out of or relating to the filing, prosecution, or resolution of claims against TLIC alleged in the Action.

116. In connection with the forgoing releases, Releasors acknowledge that there is a risk subsequent to the execution of this Settlement Agreement that Releasors may discover one or more claims or incur or suffer a loss, damage or injury that arises out of or relates to the claims asserted in the Action or to the Cash Value Increases, but that are unknown or unanticipated at the time of execution of the Settlement Agreement. Further, there is a risk that the losses or damages currently known relating to the facts and allegations raised in the Action may be or become greater or less than Releasors now expect or anticipate. Releasors assume this risk and acknowledge that the release provisions in this Section VII shall apply to all unknown or unanticipated results, as well as those known and anticipated, and by operation of the Final Approval Order and judgment, Releasors shall have expressly waived the provisions of Section 1542 of the California Civil Code as follows:

RELEASORS EXPRESSLY UNDERSTAND THAT SECTION 1542 OF THE CIVIL CODE OF THE STATE OF CALIFORNIA PROVIDES:

"A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE

CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY."

TO THE EXTENT THAT CALIFORNIA OR OTHER SIMILAR FEDERAL OR STATE LAW MAY APPLY (BECAUSE OF OR NOTWITHSTANDING THE PARTIES' CHOICE OF LAW IN THIS SETTLEMENT AGREEMENT), RELEASORS HEREBY AGREE THAT THE PROVISIONS OF SECTION 1542 AND ALL SIMILAR FEDERAL OR STATE LAWS, RIGHTS, RULES, OR LEGAL PRINCIPLES, TO THE EXTENT THEY ARE FOUND TO BE APPLICABLE HEREIN, ARE HEREBY EXPRESSLY AND VOLUNTARILY WAIVED AND RELINQUISHED BY RELEASORS TO THE MAXIMUM EXTENT PERMITTED BY LAW, AND RELEASORS HEREBY AGREE THAT THIS IS AN ESSENTIAL TERM OF THE RELEASE.

117. The Parties agree and acknowledge that the release provisions of this Section VII together constitute an essential term of the Settlement Agreement.

118. Nothing in the foregoing releases will preclude any action to enforce the terms of this Settlement Agreement.

119. The Parties expressly agree that the provisions of this Section VII shall be, and may be raised as, a complete defense to and will preclude any action or proceeding encompassed by the Released Claims. The Releasors further agree that, following the Final Approval Date, they shall not institute, maintain, assert, join, or participate in, either directly or indirectly, on their own behalf, or behalf of a class, or on behalf of any other person or entity, any action or proceeding of any kind against the Releasees relating to the Released Claims as defined under this Section VII.

120. It is the intention of the Plaintiffs, on behalf of themselves and the Settlement Class, in executing this Settlement Agreement, to fully, finally, and forever settle and release all Released Claims as defined under this Section VII, known or unknown, and which now exist, hereafter may exist, or might have existed (whether or not previously or currently asserted in any action or proceeding) with respect to the Released Claims. Upon the Final Settlement Date, the Releasors shall be deemed to have, and by operation of the Final Approval Order and judgment shall have, fully, finally, and forever released, relinquished, and discharged the Releasees of and from all Released Claims as defined under this Section VII. Releasors acknowledge that the Final Approval Order and judgment shall have res judicata, collateral estoppel and claim-preclusion effect in any court to the fullest extent permitted by law as to all Released Claims.

VIII. SERVICE AWARDS

121. Class Counsel will move for a Service Award from the Final Settlement Fund in an amount up to but not more than $25,000 for each Class Representative appointed by the Court. The purpose of such Service Awards will be to compensate Plaintiffs for their efforts undertaken on behalf of the Settlement Class.

122. No such Service Award will in any way diminish or prejudice any Settlement Relief which the recipient is otherwise eligible to receive as a Settlement Class Member.

123. The Settlement Administrator shall effectuate payment of the Service Awards from the Final Settlement Fund within seven business days after the Final Settlement Date.

IX. ATTORNEYS' FEES AND LITIGATION EXPENSES

124. Class Counsel will move for attorneys' fees not to exceed 33 1/3% of the gross benefits provided to the Settlement Class, and reimbursement for all expenses incurred or to be incurred. Class Counsel's fees and expenses, as awarded by the Court shall be paid from the Final Settlement Fund and by TLIC pursuant to Paragraph 127 below within seven business days after

the Final Settlement Date. The first $5,835,397.97 of Class Counsel's fees, if awarded by the Court, shall be paid from the interest-bearing escrow account set up in connection with the BCP Fees, described in Paragraph 127 below. The remainder of Class Counsel's fees, if any, shall be paid from the Final Settlement Fund.

125. Class Counsel will, in its sole discretion, allocate and distribute the fees and expenses that they receive pursuant to this Settlement among Class Counsel and any and all other counsel, if applicable.

126. The Class Counsel's fees and expenses, and Service Awards approved by the Court based on the Class Fee and Expense Application will be set forth in the Class Fee and Expense Order, which will be separate from the Final Approval Order so that any appeal of one will not constitute an appeal of the other. No order or proceedings relating to Class Counsel's Class Fee and Expense Application and Service Awards, nor any appeal from the Class Fee and Expense Order including Service Awards, or reversal or modification thereof, will operate to terminate or cancel this Settlement Agreement or otherwise delay the Final Approval Date or the Final Settlement Date.

127. In accordance with the agreement that TLIC entered into in exchange for Plaintiffs' withdrawal of their Motion to Require Transamerica to Reserve Attorney's Fees and Expenses from the Common Fund, *see* ECF Nos., 143-1, 136, 135, and subject to Court approval, TLIC also agrees to pay Class Counsel $5,835,397.97 (the "BCP Fees") in connection with the benefits provided by the Bonus Crediting Project. The BCP Fees shall not be paid into, and are not part of, the Final Settlement Fund. Rather, the BCP Fees shall be paid by TLIC into an interest-bearing escrow account agreed to by the Parties' Counsel to be kept separate and apart from the Settlement Fund Account within 30 calendar days after the Preliminary Approval Date, and shall be paid to Class Counsel within seven business days of the Final Settlement Date.

128. Except as provided herein, including with respect to the BCP Fees, no Party or Parties' Counsel will be liable or obligated to pay any fees, expenses, costs, or disbursements to any person, either directly or indirectly, in connection with the Action, this Settlement Agreement, or the proposed settlement, other than those expressly provided in this Settlement Agreement as being payable by such party.

129. The Parties agree that the Settlement Agreement is not conditioned on the Court's approval of any Service Awards or Class Counsel's fees and expenses.

X. FINAL APPROVAL AND DISBURSEMENT OF THE SETTLEMENT RELIEF

130. At or after the Fairness Hearing, and upon the Court's approval of this Settlement Agreement, the Parties will request from the Court entry of both (a) the Final Approval Order, and (b) the Class Fee and Expense Order.

131. The Final Approval Order proposed by the Parties will, among other things: (a) approve the proposed settlement and the Settlement Relief as fair, reasonable, and adequate; (b) dismiss the Action with prejudice pursuant to Federal Rule of Civil Procedure 41, with jurisdiction retained by the Court to enforce the terms of the Settlement Agreement; and (c) permanently enjoin all Settlement Class Members who do not execute and timely file a Request for Exclusion from the Settlement Class from filing, prosecuting, maintaining, or continuing litigation based on or related to the claims or facts alleged in the Action and the Released Claims.

132. Except as set forth in Paragraph 127 concerning the BCP Fees, the Class Fee and Expense Order will award any Service Awards and Class Counsel attorneys' fees and litigation expenses to be paid from the Final Settlement Fund.

133. Within 60 days after the Final Settlement Date or as otherwise provided in the Final Approval Order, the Settlement Administrator shall disburse the cash compensation portion of the Settlement Relief by mailing a check to each Settlement Class Member.

XI. MODIFICATION OR TERMINATION OF THIS SETTLEMENT AGREEMENT

134. The terms and provisions of this Settlement Agreement may be amended, modified, or expanded by written agreement of the Parties and approval of the Court; provided however, the Parties may by agreement effect such amendments, modifications, or expansions of this Settlement Agreement and its implementing documents (including the exhibits hereto) without notice to or approval by the Court if such changes are consistent with the Court's Preliminary Approval Order, the Court's Final Approval Order, and/or the Court's Class Fee and Expenses Order as applicable.

135. If the Court does not enter final approval of the settlement reflected in this Settlement Agreement or conditions its approval on any modifications of this Settlement Agreement that are not acceptable to the Parties, or if for any other reason the Final Settlement Date does not occur, then this Settlement Agreement will be deemed null and void ab initio. In that event: (a) any certification of any Settlement Class will be vacated and the Parties will be returned to their positions with respect to the Action as if the agreement between the Parties had not been entered into, except that no Settlement Administration Expenses shall be recouped; (b) any Court orders preliminarily or finally approving the Settlement shall be vacated by their own terms; and (c) the terms of this Settlement Agreement, the fact that TLIC did not oppose the provisional certification of the Settlement Class, or that the Court preliminarily approved certification of the Settlement Class, shall not be admissible in evidence for any purpose in the Action or any other proceeding.

136. TLIC and the Plaintiffs each have the option, but not the obligation, to terminate this Settlement Agreement if: (a) the Court or any appellate court(s) with jurisdiction over any appeal taken from the Court rejects, modifies, or denies approval of any material portion of this Settlement Agreement; or (b) the Court or any appellate court(s) with jurisdiction over any appeal taken from the Court does not enter or completely affirm, or modifies, alters, narrows, or expands,

any material portion of the Final Approval Order. The terminating Party must exercise the option provided in this Paragraph to withdraw from and terminate this Settlement Agreement in writing no later than 10 days after receiving notice of the event prompting the termination. Any disputes between or among the Parties regarding this termination provision shall be first presented to the Mediator for potential resolution and, absent resolution, to the Court for a determination. If the Settlement Agreement is so terminated, the Parties will be returned to their *status quo ante*.

137. Notwithstanding the preceding Paragraph, no Party may terminate this Settlement Agreement based on the amount of attorneys' fees and expenses or Service Awards awarded or approved by the Court or any appellate court(s).

138. Notwithstanding anything in this Settlement Agreement, if the aggregate amount of the Proportionate CVIs and the aggregate 30-Year Guaranteed CVIs that TLIC credited, attributable to Policies for which a Request for Exclusion is submitted, exceeds the percentage described in the Confidential Termination Agreement between the Parties, the Parties will have the option, in their sole and absolute discretion, to withdraw from the settlement and terminate this Settlement Agreement in writing no later than 14 days from the close of the period Requests for Exclusion are allowed. The Confidential Termination Agreement shall be disclosed to the Court *in camera* should the Court so request.

139. The Parties agree to keep the content of the Confidential Termination Agreement strictly confidential. TLIC may disclose the other terms of the settlement as necessary in its public disclosures and press releases or to its shareholders, rating agencies, regulators, or accountants. Plaintiffs may disclose the other terms of the settlement publicly as Class Counsel deems reasonably appropriate and necessary, or as necessary to comply with applicable law or regulation.

140. If this Settlement Agreement is terminated or deemed void pursuant to this Section XI, then:

a. This Settlement Agreement will be null and void and will have no force or effect, and no party to this Settlement Agreement will be bound by any of its terms;

b. All Parties will bear their own costs and expenses incurred in connection with the terminated settlement approval process, except that no Settlement Administration Expenses shall be recouped;

c. Releasees, including TLIC, will be deemed to have expressly and affirmatively reserved all defenses, arguments, assertions, and all motions as to all claims that have been or might later be asserted in the Action;

d. Plaintiffs will be deemed to have expressly and affirmatively reserved all arguments, assertions, and all motions as to all claims that have been or might later be asserted in the Action;

e. All provisions of this Settlement Agreement, and all negotiations, statements, and proceedings relating to this Settlement Agreement, will be without prejudice to the rights of TLIC, Plaintiffs, or any Settlement Class Member, all of whom will be restored to their respective positions existing immediately before the Execution Date; and

f. This Settlement Agreement, the fact of its having been made, the negotiations leading to it, and/or any action taken by a Party or Settlement Class Member pursuant to this Settlement Agreement will not be admissible or entered into evidence for any purpose whatsoever in any other legal proceeding other than the Action.

XII. GENERAL MATTERS AND RESERVATIONS

141. The Parties and the Parties' Counsel agree that their discussions and the information exchanged in the course of negotiating this settlement are confidential under the terms of the

mediation agreement signed by the Parties in connection with the mediation session with the Mediator. Such exchanged information was made available on the condition that neither the Parties nor their counsel may disclose it to third parties (other than experts or consultants retained by the Parties in connection with the Action), and that it not be publicly disclosed or used by the Parties or their counsel in any way in the Action should it not settle, or in any other proceeding; provided, however, that nothing contained herein will prohibit the Parties from referring to the existence of such information in connection with the settlement of the Action.

142. The Parties and the Parties' Counsel agree that the Confidential Information made available to them through the discovery process was made available on the condition that neither the Parties nor their counsel may disclose it to third parties except in accordance with the terms of the Protective Order (ECF No. 36). The Parties agree to comply with the Protective Order with respect to the return or destruction of Confidential Information. Notwithstanding any agreement to return or destroy Confidential Information, Class Counsel may retain (i) attorney work product; (ii) email communications between the Parties; and (iii) all documents filed with the Court including those filed under seal. Any retained Confidential Information shall continue to be protected under the Protective Order.

143. TLIC agrees to provide all data reasonably necessary for Class Counsel to effectuate the distribution of Class Notice, the implementation of any Plan of Allocation, and distribution of payments to Settlement Class Members.

144. The Parties will attempt to resolve any disputes that may arise concerning the interpretation of this Settlement Agreement in good faith. The Parties agree to mediate any disputes regarding the interpretation of this Settlement Agreement or exhibits attached hereto with the Mediator prior to seeking Court involvement. If the Parties fail to resolve the dispute after mediation, the Court retains jurisdiction to resolve such disputes without regard to any Mediator

recommendation.

145. Class Counsel represents that they: (a) are authorized to enter into this Settlement Agreement on behalf of Plaintiffs; and (b) are doing so to protect the best interests of the Settlement Class.

146. The Class Representatives represent and certify that: (a) they have agreed to serve as representatives of the Settlement Class proposed to be certified for settlement purposes herein; (b) they remain willing, able, and ready to perform all of the duties and obligations of a representative of the Settlement Class; (c) they are familiar with the allegations in the Action, including the CAC, or have had the contents of such allegations described or conveyed to them; (d) they have consulted with Class Counsel about the Action (including discovery conducted in the Action), this Settlement Agreement, and their obligations as class representatives; (e) they have authorized Class Counsel to execute this Settlement Agreement on their behalf; and (f) they will remain and serve as a Class Representative of the Settlement Class until the terms of this Settlement Agreement are effectuated and fully implemented, this Settlement Agreement is terminated in accordance with its terms, or, with respect to an individual Plaintiff, the Court at any time determines that said Plaintiff cannot represent the Settlement Class.

147. The undersigned TLIC representatives represent that they are authorized to enter into this Settlement Agreement on behalf of TLIC.

148. This Settlement Agreement, including the exhibits hereto, which are an integral part of this Settlement Agreement, sets forth the entire agreement among the Parties with respect to its subject matter, and it may not be altered or modified except by written instrument executed by all Parties' Counsel or authorized representatives or as set forth herein. The Parties expressly acknowledge that no other agreements, arrangements, or understandings not expressed or referred to in this Settlement Agreement exist among or between them.

149. The terms "he or she" and "his or her" include "it" or "its," where applicable. Defined terms expressed in the singular also include the plural form of such term, and vice versa, where applicable.

150. This Settlement Agreement and any ancillary agreements will be governed by and interpreted in accordance with the laws of the State of California, without reference to its choice of law or conflict of laws rules.

151. Whenever this Settlement Agreement requires or contemplates that one Party will or may give notice to the other, notice will be provided by e-mail and/or next-day (excluding Saturday and Sunday) express delivery service as follows:

If to TLIC, then to:

Elizabeth G. Doolin
Julie F. Wall
Joseph R. Jeffery
Kaitlyn E. Luther
CHITTENDEN, MURDAY & NOVOTNY LLC
303 West Madison Street, Suite 2400
Chicago, IL 60606
Telephone: 312-281-3600
Facsimile: 312-281-3678
Email: edoolin@cmn-law.com
jwall@cmn-law.com
jjeffery@cmn-law.com
kluther@cmn-law.com

If to Plaintiffs, then to:

Steven Sklaver
SUSMAN GODFREY LLP
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90006
Tel.: 310-789-3100
Fax: 310-789-3150
E-mail: ssklaver@susmangodfrey.com

Seth Ard
Zach Savage
SUSMAN GODFREY LLP

One Manhattan West, 50th Floor
New York, NY 10001
Tel.: 212-336-8330
Fax: 212-336-8340
E-mail: sard@susmangodfrey.com
zsavage@susmangodfrey.com

152. All time periods set forth herein will be computed in calendar days unless otherwise expressly provided. In computing any period of time prescribed or allowed by this Settlement Agreement or by order of court, the day of the act, event, or default from which the designated period of time begins to run will not be included. Each other day of the period to be computed will be included, including the last day thereof, unless such last day is a Saturday, a Sunday, or a legal holiday, or, when the act to be done is the filing of a paper in court, a day on which weather or other conditions have made the office of the Clerk of the Court inaccessible, in which event the last day of the period will be the next day that is not one of the aforementioned days. As used in this Paragraph, "legal holiday" includes New Year's Day, Martin Luther King, Jr. Day, Presidents' Day, Memorial Day, Juneteenth National Independence Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day, Christmas Day and any other day appointed as a holiday by the President or the Congress of the United States.

153. The Parties reserve the right to agree between themselves on any reasonable extensions of time that might be necessary to carry out any of the provisions of this Settlement Agreement.

154. The Parties agree that (a) this Settlement Agreement is clear and unambiguous, has been drafted and negotiated by the Parties' Counsel at arm's length, and will not be construed more strictly against any of the Parties; and (b) no parol or other evidence may be offered to explain, construe, contradict, or clarify the terms of this Settlement Agreement, the intent of the Parties or the Parties' Counsel, or the circumstances under which this Settlement Agreement was made or

executed.

155. TLIC considers it desirable for the Action to be settled and dismissed because this settlement will: (a) provide substantial benefits to Settlement Class Members through processes that provide fair and adequate procedural and substantive protections both to Settlement Class Members and to TLIC; (b) put to rest Plaintiffs' claims and the underlying matters; and (c) avoid the substantial expense, burden, and uncertainties associated with the continued litigation of those claims. In no event may this Settlement Agreement, any of its provisions, or any negotiations, statements, or court proceedings relating to them in any way be construed as, offered as, received as, used as, or deemed to be evidence of any kind in the Action, any other action, or in any judicial, administrative, regulatory, or other proceeding, except in a proceeding to enforce this Settlement Agreement. Without limiting the foregoing, neither this Settlement Agreement nor any related negotiations, statements, or court proceedings will be construed as, offered as, received as, used as, or deemed to be evidence or an adjudication, admission, or concession of any liability or wrongdoing whatsoever on the part of any person or entity, including, but not limited to, TLIC or Plaintiffs, or as a waiver by TLIC or Plaintiffs of any applicable claims or defenses.

156. TLIC represents, warrants, and covenants, as to any payment to be made by or on behalf of TLIC in connection with this Settlement Agreement, at the time such payment is made, TLIC will not be insolvent, nor will the payment required to be made by or on behalf of TLIC render TLIC insolvent, within the meaning of and/or for the purposes of the United States Bankruptcy Code.

157. Neither this Settlement Agreement nor any of the relief to be offered under the proposed settlement will be interpreted to alter in any way the contractual terms of any Settlement Class Policy, or to constitute a novation of any Settlement Class Policy, except as expressly provided by this Settlement Agreement or the relief granted in accordance with the terms of this

Settlement Agreement. This Settlement Agreement does not, and will not be deemed to, create any fiduciary or similar relationship between TLIC and any of its current, past, or prospective Policyowners or contract owners. This Settlement Agreement does not impose, and will not be deemed to impose, any fiduciary or other similar duty on TLIC, and TLIC expressly disclaims any fiduciary or other similar duties. The duties and obligations assumed by TLIC as a result of this Settlement Agreement are limited to those expressly set forth in this Settlement Agreement.

158. No opinion concerning the tax consequences of the proposed settlement to any person or entity in the Settlement Class is given or will be given by TLIC, TLIC's Counsel, or Class counsel, nor are any representations or warranties in this regard made by virtue of this Settlement Agreement. The Settlement Class Notice will direct persons and entities in the Settlement Class to consult their own tax advisors regarding the tax consequences of the proposed settlement, including the tax consequences of any payments, credits, and payment periods provided for hereunder, and any tax reporting obligations they may have with respect thereto. The tax obligations of each Settlement Class Member, and the determination thereof, are the sole responsibility of each such person or entity, and it is understood that the tax consequences of the settlement may vary depending on the particular circumstances of each such person and entity.

159. All taxes resulting from the tax liabilities of the Settlement Fund shall be paid solely out of the Final Settlement Fund.

160. No Party shall be deemed the prevailing party for any purposes of this Action.

161. The Parties and their successors, assigns, and attorneys undertake to implement the terms of this Settlement Agreement in good faith, and to use good faith in resolving any disputes that may arise in the implementation of the terms of this Settlement Agreement.

162. The Parties and their successors, assigns, and attorneys agree to cooperate fully with one another in seeking court approval of this Settlement Agreement and in preparing all final

approval papers and to use their commercially reasonable best efforts to affect the prompt consummation of this Settlement Agreement and the proposed settlement.

163. This Settlement Agreement may be signed in counterparts, whether by hand or electronically by DocuSign, each of which will constitute a duplicate original.

WILLIAM F. WREN:

Agreed to this 9TH day of July, 2026.

By: William F. Wren
Name: William F. Wren

JOHN MURPHY:

Agreed to this 8th day of July, 2026.

By: _____
Name: John Murphy

Docusign Envelope ID: FB16C23A-01A2-8E06-83FD-BC7533D40B38

TRANSAMERICA LIFE INSURANCE COMPANY:

Agreed to this 9th day of July, 2026:

DocuSigned by:
By: Bonnie Gerst
662307BBE8384C3...
Name: Bonnie Gerst
Title: President, Financial Assets

APPROVED ONLY AS TO FORM

For Plaintiffs:

Agreed to this 9th day of July, 2026:

By: Z-B. Savage
Name: Zach Savage
Firm: Susman Godfrey L.L.P.

For Transamerica Life Insurance Company:

Agreed to this ____ day of _____, 2026:

By:_____
Name:
Firm: Chittenden, Murday & Novotny LLC

Docusign Envelope ID: FB16C23A-01A2-8E06-83FD-BC7533D40B38

APPROVED ONLY AS TO FORM

For Plaintiffs:

Agreed to this ____ day of _____, 2026:

By:_____
Name:
Firm: Susman Godfrey L.L.P.

For Transamerica Life Insurance Company:

Agreed to this 9th day of July, 2026:

DocuSigned by:
By: Elizabeth G. Doolin
96F3CD6DABB4493...
Name: Elizabeth G. Doolin
Firm: Chittenden, Murday & Novotny LLC

EXHIBIT A: PLAN OF ALLOCATION[3]

1. Each Settlement Class Member who is the current owner of a Settlement Class Policy according to TLIC's records ("Recipient") shall be issued a check for that Policy equal to that Recipient's pro-rata share of the Net Settlement Fund. No claim form or claims process will be used.

2. Each Recipient's pro-rata share of the Net Settlement Fund shall be computed as follows:

    a. First, the unpaid CVI amount for the Policy's 30-Year Anniversary ("Unpaid 30-Year CVI Amount") for each Recipient is: (i) for Policies with a single 30-year CVI percentage, the amount of the CVI due using the 30-year CVI percentage, and for Policies with 30-Year Guaranteed and 30-Year Non-Guaranteed CVI percentages, the amount of the CVI due using the 30-Year Guaranteed CVI percentage; less (ii) the 30-year CVI amount(s), if any, that were credited to the Policy exclusive of any interest included in the credited 30-year CVI amount(s). For the avoidance of doubt, any Policy that received a credit for its 30-Year Guaranteed CVI amount under the Bonus Crediting Project shall have an Unpaid 30-Year CVI Amount of zero.

    b. Second, each Recipient's Unpaid 30-Year CVI Amount shall be divided by the total Unpaid 30-Year CVI Amount for the Settlement Class Policies to determine each Recipient's share of the total Unpaid 30-Year CVI Amount.

    c. Third, each Recipient's share of total Unpaid 30-Year CVI Amount shall be multiplied by the Net Settlement Fund to determine the Recipient's pro-rata share of the Net Settlement Fund. Except for any Recipient whose Policy was included in the Bonus Crediting Project, no Recipient's share of the Net Settlement Fund shall be less than $100, including those Settlement Class Members whose Policies terminated prior to their 30-Year Anniversary, who have no Unpaid 30-Year CVI Amounts.

3. If, for a particular Settlement Class Policy, there are two or more Policyowners reflected in TLIC's records as the current owners of an inforce Policy or the last owners of a terminated Policy, then the Recipient's pro-rata share of the Net Settlement Fund shall be divided equally among each of those Policyowners.

4. Within one year plus 30 days after the date the Settlement Administrator mails the first checks, any funds remaining in the Net Settlement Fund shall be redistributed on a pro-rata basis to Recipients who previously negotiated the checks they received, to the extent feasible and practical in light of the costs of administering such subsequent payments, unless the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair. Following a redistribution, Class Counsel and the Settlement Administrator will determine whether additional redistributions are feasible and practical in light of the aforementioned considerations, and will effectuate any such redistributions to eligible Settlement Class Members who previously cashed the checks they received in the previous redistribution round. All costs associated with the disposition of residual funds—whether

[3] All capitalized terms herein are used as defined in the Settlement Agreement and Release or this Plan of Allocation.

through additional distributions to Settlement Class Members and/or through an alternative plan approved by the Court—shall be borne solely by the Final Settlement Fund.

5. The Plan of Allocation may be modified upon further order of the Court. Any updates to the Plan of Allocation will be published on the Settlement Class Website.

EXHIBIT B: LONG-FORM SETTLEMENT CLASS NOTICE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

If you own or owned certain Direct Recognition Life insurance policies, you may be affected by a class action settlement with Transamerica Life Insurance Company

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

- A proposed settlement has been reached in a class action lawsuit called *Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP (C.D. Cal.). The class action lawsuit is referred to herein as "the Action," and the proposed settlement reached in the Action is referred to herein as the "Settlement."
- The lawsuit concerns certain Direct Recognition Life ("DRL") insurance policies issued by Defendant Transamerica Life Insurance Company ("TLIC"). The lawsuit claims that TLIC improperly failed to credit certain Cash Value Increases ("CVIs") to eligible DRL policies and did not act in good faith regarding those CVIs.
- TLIC denies all allegations of wrongdoing and denies that it violated any law, breached any contract, acted in bad faith, or acted improperly in any way. The Court has not decided who is right. Instead, Plaintiffs and TLIC (together, the "Parties") have agreed to settle to avoid the cost, delay, and risk of continued litigation.
- If the Court approves the Settlement, Settlement Class Members will be eligible to receive payment from a **$110 million Settlement Fund**, as further detailed in response to Question 10. In addition, TLIC has agreed (1) to credit the 40-Year Guaranteed CVI for certain eligible DRL Policies, if they remain in force on their 40-year policy anniversaries and (2) to not seek to void, rescind, cancel, declare void, or deny death claims submitted by Settlement Class Members based on alleged lack of insurable interest or alleged misrepresentations made in connection with the original application process.
- You are a Settlement Class Member if you meet the following criteria:
  - ✓ You own or owned a TLIC universal life insurance policy that was in effect on January 1, 2016;
  - ✓ The policy was known by the product names "Direct Recognition Life 10" or "Direct Recognition Life 11", or by the attribute codes "DRL-10" or "DRL-11";
  - ✓ The policy was established and defined by the provisions of a Group Master Policy, Group Insurance Certificate, and Issue Illustration.
- TLIC's records indicate that you are a Settlement Class Member and entitled to benefits under the Settlement.
- Your legal rights are affected whether or not you act. ***Please read this Notice carefully***.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
Do Nothing	• Remain in the Settlement Class • Get certain benefits from the Settlement — Automatically receive a payment by check in the mail if you are entitled to one and the Settlement is approved by the Court • Be bound by the Settlement • Give up your right to sue or continue to sue TLIC for the claims in this case	
Ask to be Excluded **("Opt Out")**	• Remove yourself from the Settlement Class • Get no cash payment from the Settlement • Keep your right to sue or continue to sue TLIC, at your own expense, for the claims in this case	Postmarked by **Month x, 202x [45 days after PAO]**
Object	• Remain in the Settlement Class but tell the Court what you do not like about the Settlement • The purpose of an objection is to persuade the Court not to approve the proposed Settlement • A successful objection to the Settlement may mean that the objector and other members of the Class are not bound by the Settlement	Filed and served by **Month x, 202x**
Attend the Fairness Hearing	• Ask to speak at the Fairness Hearing regarding the Settlement	Hearing scheduled for **Month x, 202x**

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice. The deadlines may be moved, cancelled, or otherwise modified, so please check www.xxxxxxxxxx.com regularly for updates and further details.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved, which could take time. Please be patient.

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BASIC INFORMATION

1. Why was this Notice issued?

The Court authorized this Notice because you have a right to know about the proposed Settlement and your rights and options before the Court decides whether to grant final approval of the Settlement. This Notice explains what the lawsuit is about; who is included in the Settlement; what benefits are available; how to request exclusion from the Settlement; how to object to the Settlement; and when the Court will decide whether to approve the Settlement.

Honorable Jesus G. Bernal of the United States District Court for the Central District of California (the "Court") is in charge of this case. The case is called *Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP (C.D. Cal.). The persons who sued are Plaintiffs William F. Wren and John Murphy. The company they sued, Transamerica Life Insurance Company ("TLIC"), is called the Defendant.

2. What is this lawsuit about?

Plaintiffs allege that TLIC improperly failed to credit certain Cash Value Increases ("CVIs") associated with certain Direct Recognition Life ("DRL") insurance policies and failed to act in good faith in connection with those CVIs. Plaintiffs seek monetary and other relief on behalf of themselves and a proposed Settlement Class of similarly situated policyowners.

TLIC denies all Plaintiffs' allegations of wrongdoing, denies any liability, and contends that its conduct complied with the terms of the policies, applicable agreements, and governing laws. The Court has not decided who is right. Instead, Plaintiffs and TLIC (together, the "Parties") have agreed to settle to avoid the risks, costs, and delays of further litigation.

3. Which life insurance policies are affected by the lawsuit?

The Settlement generally includes certain DRL-10 and DRL-11 policies identified in the Settlement Agreement. If you received a notice in the mail, TLIC's records indicate that you may be a member of the Settlement Class. If you are uncertain whether you are included, you may contact the Settlement Administrator or Class Counsel using the contact information listed below (See Questions 17 and 26).

4. What is a class action and who is involved?

In a class action, a person(s) or entity(ies) called a "Class Representative(s)" sues on behalf of all individuals who have a similar claim. Here, Plaintiffs William F. Wren and John Murphy represent other eligible policyowners and together they are called the "Settlement Class" or "Settlement Class Members." Bringing a case, such as this one, as a class action allows resolution of many similar claims of persons and entities that might be economically too small to bring in individual actions. One court resolves the issues for all class members, except for those who validly exclude themselves from the class.

5. Why is this lawsuit a class action?

The Parties are seeking class certification because they believe this lawsuit meets the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal court. Specifically:

- There are numerous Settlement Class Members whose interests will be affected by this lawsuit;
- There are legal questions and facts that are common to all the Settlement Class Members;
- The Class Representatives' claims are typical of the claims of the rest of the Settlement Class;
- The Class Representatives and the lawyers representing the Settlement Class will fairly and adequately represent the interests of the Settlement Class;
- A class action would be a fair, efficient and superior way to resolve this lawsuit; and
- The common legal questions and facts predominate over questions that affect only individual Settlement Class Members.

6. Why is there a Settlement?

The Parties reached the proposed Settlement after extensive litigation, discovery, investigation, and mediation with experienced mediator Robert Meyer of JAMS. By settling, the Parties avoid the risks, expense, and delay associated with continued litigation and trial. The Plaintiffs and Class Counsel believe the proposed Settlement is fair, reasonable, adequate, and in the best interests of the Settlement Class.

THE SETTLEMENT CLASS

7. Am I part of the Settlement Class?

You are a Settlement Class Member if you meet the following criteria:

- ✓ You own or owned a TLIC universal life insurance policy that was in effect on January 1, 2016;
- ✓ The policy was known by the product names "Direct Recognition Life 10" or "Direct Recognition Life 11", or by the attribute codes "DRL-10" or "DRL-11";
- ✓ The policy was established and defined by the provisions of a Group Master Policy, Group Insurance Certificate, and Issue Illustration.

8. Are there exceptions to being included?

Yes. Excluded from the Settlement Class are:

- The Honorable Jesus G. Bernal, U.S. District Court Judge of the Central District of California (or other Circuit, District, or Magistrate Judge presiding over the Action through which this matter is presented for settlement) and his immediate family;
- TLIC;
- Any officer or director of TLIC reported in its most recent Annual Statements, and members of their immediate families;
- Anyone employed in Class Counsel's firms;
- Policyowners who properly execute and timely file a Request for Exclusion from the Settlement Class;
- Certain Policyowners whom TLIC has identified as excluded pursuant to prior confidential agreements with TLIC; and
- The legal representatives, successors, or assigns of any of the excluded Policyowners (but only then in their capacity as legal representative, successor, or assignee).

9. What if I am still not sure if I am included?

If you are still not sure whether you are a Settlement Class Member, please visit www.xxxxx.com, call the Settlement Administrator toll-free at 1-xxx-xxx-xxxx, or write to: Wren v. TLIC Settlement Administrator, c/o JND Legal Administration, P.O. Box x, Seattle, WA 98111.

WHAT SETTLEMENT CLASS MEMBERS GET

10. What does the Settlement provide?

The proposed Settlement provides for:

1. **$110 Million Settlement Fund**

   TLIC has agreed to create a $110 million Settlement Fund. After deducting Settlement Administration Expenses, any Service Awards to the Class Representatives, any Class Counsel's fees and expenses awarded by the Court, and any other Court-approved payments, the remaining amount (the "Net Settlement Fund") will be distributed to Settlement Class Members based on a Court-approved Plan of

Allocation. The amount each Settlement Class Member receives will depend on factors including the relative value of qualifying CVIs associated with the applicable policy or policies.

2. **Bonus Crediting Project**

   TLIC has agreed that it will not rescind, revoke, or reverse certain credits it paid, and has committed to pay, pursuant to a "Bonus Crediting Project" it undertook in 2025 and 2026 as a result of this litigation under which it credited or will credit 30-Year Guaranteed CVIs to in-force DRL policies.

3. **40-Year Guaranteed CVI Benefit**

   TLIC has agreed that it will credit the 40-Year Guaranteed CVI for certain eligible DRL policies if they remain in force on their 40-year policy anniversaries.

4. **Non-Contestability Benefit**

   TLIC has agreed that it will not seek to void, rescind, cancel, declare void, or otherwise deny certain death claims submitted by Settlement Class Members based on alleged lack of insurable interest or alleged misrepresentations made in connection with the original application process.

More details are in a document called the Settlement Agreement, which is available at www.xxxxxx.com.

11. What am I giving up by staying in the Settlement?

If the Settlement becomes final and you do not exclude yourself, you will release and discharge certain claims against TLIC, as well as TLIC's past and present parents (including intermediate and ultimate parents), direct and indirect subsidiaries, affiliates, predecessors, joint ventures, successors and assigns, together with each of their past and present officers, directors, shareholders, employees, representatives, attorneys, general agents, agents and producers (including, but not limited to, those acting on behalf of TLIC and within the scope of their agency), TLIC's Counsel, and all of such entities' heirs, administrators, executors, insurers, predecessors, successors and assigns, or any of them, and including any person or entity acting on behalf or at the direction of any of them.

Generally, the Released Claims include claims arising out of or relating to TLIC's refusal to credit the Settlement Class Policies' CVIs and its good faith in connection with the same. Released Claims **do not** include (1) any claim for payment of a death benefit on a DRL Policy other than any claim for any unpaid CVIs as a portion of a death benefit; (2) any claims or rights to otherwise enforce the terms of a DRL Policy unrelated to the CVIs; or (3) any claims to enforce the Settlement.

The Settlement Agreement contains the complete release language, which is available at www.xxxxx.com.

HOW TO GET A PAYMENT

12. How can I get a payment?

You will automatically receive a settlement check in the mail from JND Legal Administration as the Settlement Administrator if you are entitled to one. No claims need to be filed. You should consult with your own tax advisor regarding the tax consequences of the proposed Settlement, including but not limited to, any payments and payment periods, and any tax reporting obligations you may have.

13. When will I get my payment?

Payments will be mailed to Settlement Class Members after the Court grants "final approval" of the Settlement and after all appeals are resolved. If the Court approves the Settlement, there may be appeals. It is always uncertain how these appeals will be resolved and resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from the Settlement or you want to keep the right to sue or continue to sue TLIC on your own about the claims released in the Settlement, then you must take steps to get out of the Settlement Class. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Settlement.

14. How do I ask to be excluded?

To exclude yourself from (or "opt-out of") the Settlement, you must complete and mail the Settlement Administrator a written request for exclusion. The exclusion request **must** include the following:

- The name and civil action number of the Action—*Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP, pending in the United States District Court for the Central District of California;
- Your full name, the Policyowner name(s), mailing address, telephone number, and email address (optional);
- The policy number(s) to be excluded;
- A statement that you want to be excluded from the Settlement Class; and
- Your personal signature (and the signature of all policyowners, if applicable).

You must mail your exclusion request **postmarked by Month x, 202x** to:

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

If you own multiple policies, your exclusion will include **all** Settlement Class policies that you own. However, if you own multiple policies in a representative or agency capacity (for example, as a trustee, securities intermediary, or other similar agency) for more than one principal, you may request to exclude policies held on behalf of one principal while participating in the Settlement with respect to the policies held by other principals.

IF YOU DO NOT EXCLUDE YOURSELF BY MONTH X, 202x, YOU WILL REMAIN PART OF THE SETTLEMENT CLASS AND BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT.

15. If I don't exclude myself, can I sue TLIC for the same thing later?

No. If you do not exclude yourself, you will give up any right to sue TLIC for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. You must exclude yourself from this Settlement to continue your own lawsuit if it involves a claim that this Settlement resolves. If you properly exclude yourself from the Settlement, you will not be bound by any orders or judgments entered in the Action relating to the Settlement.

16. If I exclude myself, can I still get a Settlement payment?

No. You will not get a cash payment from the Settlement if you exclude yourself.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court has appointed the following lawyers as Class Counsel.

Steven G. Sklaver
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90006
ssklaver@susmangodfrey.com

Andrew S. Friedman
Francis J. Balint
BONNET FAIRBOURN FRIEDMAN & BALINT, PC
2325 East Camelback Road, Suite 300
Phoenix, AZ 85016
afriedman@bffb.com
fbalint@bffb.com

Seth Ard
Zach Savage
SUSMAN GODFREY L.L.P.
One Manhattan West, 50th Floor
New York, NY 10001
sard@susmangodfrey.com
zsavage@susmangodfrey.com

18. How will the lawyers be paid?

The Court will determine how much Class Counsel will be paid for fees and expenses. Class Counsel will request attorneys' fees not to exceed one-third of the gross settlement benefits provided to the Settlement Class. Those fees will be paid from the $110 million Settlement Fund, and from a separate $5,835,397.97 fund created by the Settlement in connection with the Bonus Crediting Project described above. In addition, Class Counsel will seek a service award up to $25,000 for each Plaintiff, William F. Wren and John Murphy, for their service as the Class Representatives on behalf of the Settlement Class, to be paid from the Settlement Fund. You will not be responsible for direct payment of any of these fees, expenses, or awards. The motion for attorneys' fees, expenses, and service awards will be posted at www.xxxxxxxx.com before the deadline to object to the Settlement.

19. Should I get my own lawyer?

If you stay in the Settlement Class, you do not need to hire your own lawyer. Class Counsel is working on behalf of the Settlement Class. However, if you want to be represented by your own lawyer, you may hire one at your own expense and cost.

OBJECTING TO THE SETTLEMENT

20. How can I tell the Court if I do not like the Settlement?

Any Settlement Class Member who does not timely and properly opt out of the Settlement may object to the fairness, reasonableness, or adequacy of the proposed Settlement. Settlement Class Members who wish to object to any term of the Settlement must do so, in writing, by filing a written objection with the Court, and serving copies on Class Counsel and TLIC's Counsel. The written objection **must** include:

- The name and civil action number of the Action—*Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP, pending in the United States District Court for the Central District of California;
- Your full name, mailing address, telephone number and email address (optional);
- Your qualifying certificate number(s);
- A statement that you object to the Settlement in whole or in part;
- The legal and factual reasons for your objection;
- Copies of any documents supporting your objection;
- A statement indicating whether you intend to appear at the Fairness Hearing, and the identity of your attorney (if you are represented by an attorney); and

- A list of any witnesses you may call to testify at the Fairness Hearing;
- Your signature (and signatures of all policyowners, if applicable).

Your objection, along with any supporting material you wish to submit, must be filed with the Office of the Court, with a copy served on Class Counsel and TLIC's Counsel by **Month x, 202x** at the following addresses:

Clerk of the Court	
Office of the Clerk United States District Court for the Central District of California George E. Brown, Jr. Federal Building and United States Courthouse 3470 Twelfth Street Riverside, CA 92501	
Class Counsel	**Counsel for TLIC**
Steven Sklaver SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, 14th Floor Los Angeles, CA 90006 Seth Ard Zach Savage SUSMAN GODFREY L.L.P. One Manhattan West, 50th Floor New York, NY 10001 Andrew S. Friedman Francis J. Balint BONNET FAIRBOURN FRIEDMAN & BALINT, PC 2325 East Camelback Road, Suite 300 Phoenix, AZ 85016	Elizabeth G. Doolin Julie F. Wall Joseph R. Jeffery Kaitlyn E. Luther CHITTENDEN, MURDAY & NOVOTNY LLC 303 West Madison Street, Suite 2400 Chicago, IL 60606 Vivian I. Orlando Richard B. Hopkins, II MAYNARD NEXSEN LLP 10100 Santa Monica Boulevard, Suite 1700 Los Angeles, CA 90067

21. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. An objection can't ask the Court to order a different settlement. The purpose of an objection to the Settlement is to persuade the Court **not** to approve the proposed Settlement. A successful objection to the Settlement may mean that the objector and other members of the Class are not bound by the Settlement. Excluding yourself from the Settlement is telling the Court that you do not want to be part of the Settlement. If you exclude yourself from the Settlement, you have no basis to object to the Settlement because it no longer affects you.

THE COURT'S FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on Month x, 202x at x:xx x.m. PT at the United States District Court for the Central District of California, Courtroom 1, 2nd Floor, George E. Brown, Jr. Federal Building and United States Courthouse 3470 Twelfth Street, Riverside, CA 92501. At the hearing, the Court will consider whether the Settlement is fair, reasonable, adequate, and in the best interest of the Settlement Class Members; whether the Settlement Class should be finally certified; whether the requested attorneys' fees and expenses and service awards for Class Representatives should be approved. If there are objections,

the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The Court may reschedule the hearing without further mailed notice. Please check www.xxxxxxx.com for updates.

23. Do I have to come to the hearing?

No. But you or your own lawyer may attend at your own expense. If you submit an objection, you do not have to come to Court to talk about it. As long as you filed and served your written objection on time to the proper addresses, the Court will consider it.

24. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must follow the instructions for filing an Objection to the Settlement as described in response to Question 20 and indicate in your Objection to the Settlement that you or your counsel intend to appear. Your request must be filed with the Clerk of the Court and served on Class Counsel and TLIC's Counsel no later than Month x, 202x. Counsel who wishes to appear for any Objector must enter a Notice of Appearance not later than 14 days before the Fairness Hearing.

IF YOU DO NOTHING

25. What happens if I do nothing at all?

Those who are eligible to receive a payment from the Settlement do not need to do anything to receive payment. You will automatically receive a payment from the Settlement, once the Court approves it. Unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against TLIC about the legal issues that arise from the same factual predicate as the claims that are released by this Settlement ever again.

GETTING MORE INFORMATION

26. How can I get more information?

This Notice summarizes the proposed Settlement. More details are available at www.xxxxxxxx.com or by accessing the Court docket for this case, for a fee, through the Court's Public Access to Electronic Records (PACER) system at https://ecf.cacd.uscourts.gov/cgi-bin/ShowIndex.pl, or by visiting the office of the Clerk for the Court for United States District Court for the Central District of California, George E. Brown, Jr. Federal Building and United States Courthouse 3470 Twelfth Street, Riverside, CA 92501, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. You can also call the Settlement Administrator toll-free at 1-xxx-xxx-xxxx, or write to:

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

PLEASE DO NOT CONTACT THE COURT

EXHIBIT C: SHORT-FORM SETTLEMENT CLASS NOTICE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

If you own or owned certain Direct Recognition Life insurance policies, you may be affected by a class action settlement with Transamerica Life Insurance Company

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

A proposed settlement has been reached in a class action lawsuit called *Wren, et al. v. Transamerica Life Insurance Company*, Case No. 5:21-cv-00178-JGB-SP (C.D. Cal.) (the "Settlement").

Questions?
Visit wwwxxxxxxxxxxx.com
or Call 1-XXX-XXX-XXXX

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
PO Box 9XXXX
Seattle, WA 9XXXX

«MailingBarcode»
Postal Service: Please do not mark barcode

«Name»
«Address1»
«Address2»
«City», «State» «PostalCode»
«Country»

What is this lawsuit about?

Plaintiffs allege that Defendant Transamerica Life Insurance Company ("TLIC") improperly failed to credit certain Cash Value Increases ("CVIs") to eligible Direct Recognition Life ("DRL") insurance policies and did not act in good faith regarding those CVIs. TLIC denies all allegations of wrongdoing and denies that it violated any law, breached any contract, or acted improperly in any way. The Court has not decided who is right. Instead, Plaintiffs and TLIC have agreed to settle to avoid the cost, delay, and risk of continued litigation.

Who is included?

Records indicate you may be a Settlement Class Member. You are a Settlement Class Member if:

- ✓ You own or owned a TLIC universal life insurance policy that was in effect on January 1, 2016;
- ✓ The policy was known by the product names "Direct Recognition Life 10" or "Direct Recognition Life 11", or by the attribute codes "DRL-10" or "DRL-11"; and
- ✓ The policy was established and defined by the provisions of a Group Master Policy, Group Insurance Certificate, and Issue Illustration.

What does the Settlement Provide?

The proposed Settlement provides for:

1. **$110 Million Settlement Fund** - TLIC has agreed to create a $110 million Settlement Fund. After deducting Settlement Administration Expenses, any Service Awards to the Class Representatives, any Class Counsel's fees and expenses awarded by the Court, and any other Court-approved payments, the remaining amount (the "Net Settlement Fund") will be distributed to Settlement Class Members based on a Court-approved Plan of Allocation. The amount each Settlement Class Member receives will depend on factors including the relative value of qualifying CVIs associated with the applicable policy or policies.
2. **Bonus Crediting Project** – TLIC will not rescind, revoke, or reverse certain credits it paid, and it has committed to pay, pursuant to a project it undertook in 2025 and 2026 as a result of this litigation under which it credited or will credit certain 30-Year Guaranteed CVIs.
3. **40-Year Guaranteed CVI Benefit** - TLIC has agreed that it will credit the 40-Year Guaranteed CVI for certain eligible DRL policies that remain in force on their 40-year policy anniversaries.
3. **Non-Contestability Benefit** - TLIC has agreed that it will not seek to void, rescind, cancel, declare void, or otherwise deny certain death claims submitted by Settlement Class Members based on alleged lack of insurable interest or alleged misrepresentations made in connection with the original application process.

Your Options.

Do Nothing: If you do nothing, you will remain in the Settlement Class. You will get certain benefits from the Settlement and will automatically get a payment in the mail if you are entitled to one. You will be bound by the Settlement, and you will give up your right to sue or continue to sue TLIC for the claims resolved or released in this case.

Exclude Yourself (Opt Out): If you opt out, you will get no cash payment from the Settlement. But you will keep your right to sue or continue to sue TLIC, at your own expense, for the claims resolved in this case. You must exclude yourself by **Month XX, 202x**.

Object: If you do not exclude yourself, you can tell the Court what you don't like about the Settlement. The purpose of an objection is to persuade the Court not to approve the proposed Settlement. You will still be bound by the Settlement if it is approved. Objections must be filed by **Month XX, 202x**.

Go to www.xxxxxxxxx.com for details on how to opt out or file an objection.

The Court's Fairness Hearing.

The Court will hold a hearing on Month XX, 202x to consider whether to approve the Settlement, a service award up to $25,000 for each Plaintiff, reimbursement of litigation expenses, and attorneys' fees not to exceed one-third of the gross benefits provided to the Settlement Class, to be paid directly from the Settlement Fund, as well as to consider any objections. The Court appointed Susman Godfrey L.L.P. and Bonnett Fairbourn Friedman & Balint, PC to represent the Settlement Class as Class Counsel. You or your attorney may attend the hearing at your own expense, but you are not required to do so.

More Information.

Complete information about your rights and options, as well as the Long Form Notice and the Settlement Agreement are available at www.xxxxxxxx.com, by accessing the Court docket for this case, for a fee, through the Court's Public Access to Electronic Records (PACER) system at https://ecf.cacd.uscourts.gov/cgi-bin/ShowIndex.pl, or by visiting the office of the Clerk for the Court for United States District Court for the Central District of California, George E. Brown, Jr. Federal Building and United States Courthouse 3470 Twelfth Street, Riverside, CA 92501. You can also call toll-free at 1-xxx-xxx-xxxx, or write to: Wren v. TLIC Settlement Administrator, c/o JND Legal Administration, P.O. Box x, Seattle, WA 98111.



PLEASE DO NOT CONTACT THE COURT.

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Carefully separate this Address Change Form at the perforation

Name: _____

Current Address: _____

_____

_____

Unique ID: [JND Unique ID]

Address Change Form
To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

Place Stamp Here

Wren v. TLIC Settlement Administrator
c/o JND Legal Administration
PO Box 9XXXX
Seattle, WA 9XXXX

EXHIBIT 4

EXHIBIT A: PLAN OF ALLOCATION[3]

1. Each Settlement Class Member who is the current owner of a Settlement Class Policy according to TLIC's records ("Recipient") shall be issued a check for that Policy equal to that Recipient's pro-rata share of the Net Settlement Fund. No claim form or claims process will be used.

2. Each Recipient's pro-rata share of the Net Settlement Fund shall be computed as follows:

    a. First, the unpaid CVI amount for the Policy's 30-Year Anniversary ("Unpaid 30-Year CVI Amount") for each Recipient is: (i) for Policies with a single 30-year CVI percentage, the amount of the CVI due using the 30-year CVI percentage, and for Policies with 30-Year Guaranteed and 30-Year Non-Guaranteed CVI percentages, the amount of the CVI due using the 30-Year Guaranteed CVI percentage; less (ii) the 30-year CVI amount(s), if any, that were credited to the Policy exclusive of any interest included in the credited 30-year CVI amount(s). For the avoidance of doubt, any Policy that received a credit for its 30-Year Guaranteed CVI amount under the Bonus Crediting Project shall have an Unpaid 30-Year CVI Amount of zero.

    b. Second, each Recipient's Unpaid 30-Year CVI Amount shall be divided by the total Unpaid 30-Year CVI Amount for the Settlement Class Policies to determine each Recipient's share of the total Unpaid 30-Year CVI Amount.

    c. Third, each Recipient's share of total Unpaid 30-Year CVI Amount shall be multiplied by the Net Settlement Fund to determine the Recipient's pro-rata share of the Net Settlement Fund. Except for any Recipient whose Policy was included in the Bonus Crediting Project, no Recipient's share of the Net Settlement Fund shall be less than $100, including those Settlement Class Members whose Policies terminated prior to their 30-Year Anniversary, who have no Unpaid 30-Year CVI Amounts.

3. If, for a particular Settlement Class Policy, there are two or more Policyowners reflected in TLIC's records as the current owners of an inforce Policy or the last owners of a terminated Policy, then the Recipient's pro-rata share of the Net Settlement Fund shall be divided equally among each of those Policyowners.

4. Within one year plus 30 days after the date the Settlement Administrator mails the first checks, any funds remaining in the Net Settlement Fund shall be redistributed on a pro-rata basis to Recipients who previously negotiated the checks they received, to the extent feasible and practical in light of the costs of administering such subsequent payments, unless the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair. Following a redistribution, Class Counsel and the Settlement Administrator will determine whether additional redistributions are feasible and practical in light of the aforementioned considerations, and will effectuate any such redistributions to eligible Settlement Class Members who previously cashed the checks they received in the previous redistribution round. All costs associated with the disposition of residual funds—whether

[3] All capitalized terms herein are used as defined in the Settlement Agreement and Release or this Plan of Allocation.

through additional distributions to Settlement Class Members and/or through an alternative plan approved by the Court—shall be borne solely by the Final Settlement Fund.

5. The Plan of Allocation may be modified upon further order of the Court. Any updates to the Plan of Allocation will be published on the Settlement Class Website.

EXHIBIT 5

VIVIAN I. ORLANDO
VOrlando@maynardnexsen.com
RICHARD B. HOPKINS, II
RHopkins@maynardnexsen.com
MAYNARD NEXSEN LLP
10100 Santa Monica Boulevard, Suite 1700
Los Angeles, CA 90067
Phone: (310) 596-4500
Fax: (205) 254-1999

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JOSEPH R. JEFFERY (*pro hac vice*)
jjeffery@cmn-law.com
KAITLYN E. LUTHER (*pro hac vice*)
kluther@cmn-law.com
CHITTENDEN, MURDAY & NOVOTNY LLC
303 West Madison Street, Suite 2400
Chicago, IL 60606
Telephone: 312-281-3600
Facsimile: 312-281-3678

Attorneys for Defendant
Transamerica Life Insurance Company

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

WILLIAM F. WREN and JOHN MURPHY, on behalf of themselves and others similarly situated,

Plaintiff,

vs.

TRANSAMERICA LIFE INSURANCE COMPANY, an Iowa corporation,

Defendant.

Case No. 5:21-cv-00178-JGB-SP

DECLARATION OF JOSEPH R. JEFFERY

I, Joseph R. Jeffery, declare and state as follows:

1. I am a partner at the law firm of Chittenden, Murday & Novotny LLC and am one of the attorneys representing Defendant Transamerica Life Insurance Company in this nationwide class action.

2. Plaintiffs filed their Notice of Motion and Unopposed Motion Preliminarily Certifying and Approving Class Action Settlement on July 10, 2026.

3. On behalf of Transamerica and in compliance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, our office on July 20, 2026 separately served paper copies of the following documents on the Acting United States Attorney General and the person with primary regulatory or supervisory responsibility over life insurance in each of the 50 states, Washington, D.C., and Puerto Rico.

a. *William F. Wren v. Transamerica Life Insurance Company* – Class Action Complaint and Demand for Jury Trial, including Exhibits A through K.

b. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J.

c. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J.

d. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement.

e. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice.

f. Settlement Agreement and Release.

g. A document identifying the names of class members who reside in the recipient's state or territory and the estimated proportionate share of the claims of such members to the entire settlement. The document sent to the Acting United States Attorney General identified the names of all class members residing in the United States and territories and the estimated proportionate share of the claims of such members to the entire settlement.

True and correct copies of the July 20th cover letters sent to each of the 53 recipients are attached as Exhibit 1.

4. Our office served the CAFA disclosure packages upon each recipient by registered mail, return receipt requested. We received signed return receipts for 50 of the 53 packages mailed. True and correct copies of the return receipts are attached as Exhibit 2.

5. Our office did not receive return receipts for the packages mailed to the Acting United States Attorney General or the appropriate State officials in Colorado, Connecticut, Georgia, Maine, or Maryland. The United States Postal Service's online tracking system confirmed the packages mailed to those recipients were delivered no later than July 28, 2026. True and correct copies of the online tracking entries confirming the delivery of the CAFA packages to those authorities are attached as Exhibit 3.

6. An individual representing the Commissioner of the Connecticut Insurance Department called Elizabeth G. Doolin, another of the attorneys representing Transamerica in this matter, on August 14, 2026 to ask why the CAFA disclosures were sent to the Commissioner. Ms. Doolin explained that Transamerica was required to serve the disclosures on the Commissioner because he is the "appropriate State official" for purposes of CAFA. *See* 28 U.S.C. § 1715(a).

7. Under cover of a letter dated July 24, 2026, the New York State Department of Financial Services returned the CAFA disclosures sent to it on July 20th. The Department's letter stated that it "ha[s] no authority to accept service of process for an action which is generated in a court outside the [S]tate of New York." A true and correct copy of the Department's letter is attached as Exhibit 4.

8. In response, we once again informed the Department in a letter dated August 4, 2026, that the materials were submitted to it pursuant to CAFA, and we advised that the Department was not being asked to accept service of process for a lawsuit. The letter enclosed paper copies of our office's original July 20, 2026 cover

letter and the entire package of CAFA disclosure documents. A true and correct copy of our August 4, 2026 letter is attached as Exhibit 5.

9. On or about September 16, 2026, the envelope containing the letters and CAFA disclosure documents sent to the Department on August 4 was returned to our office unopened.

10. I contacted the Department the same day and was put in touch with its Senior Enforcement Counsel, who handles CAFA disclosures submitted to the Department. Under cover of a letter dated September 16, 2026, and in accordance with the instructions provided by the Department's Senior Enforcement Counsel, I once again enclosed copies of the CAFA disclosures and the July 20th cover letter. A true and correct copy of the letter to the Department dated September 16, 2026 is attached as Exhibit 6.

11. Our office has received no other responses to the 53 CAFA disclosure packages served on the state, federal, and territorial officials described.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 8, 2026

/s/ Joseph R. Jeffery
Joseph R. Jeffery

Exhibit 1

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Mark Fowler
Commissioner
Alabama Department of Insurance
P.O. Box 303351
Montgomery, AL 36130

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Fowler:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Heather Carpenter, Director
Alaska Department of Commerce, Community
& Economic Development
P.O. Box 110805
Juneau, AK 99811-0805

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Carpenter:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Charles Bassett, J.D., Director
Arizona Department of Insurance
And Financial Institutions
100 N. 15th Avenue, Suite 261
Phoenix, AZ 85007-2630

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Bassett:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosure

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Jimmy Harris
Commissioner
Arkansas Insurance Department
1 Commerce Way, Building 4
Little Rock, AR 72202

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Harris:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosure

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Laura Ricardo
Commissioner
California Department of Insurance
300 Capitol Mall, 17th Floor
Sacramento, CA 95814

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Ricardo:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Michael Conway, J.D.,
Commissioner
Division of Insurance
Colorado Department of Regulatory Agencies
1560 Broadway, Suite 850
Denver, CO 80202

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Conway:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
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www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Joshua Hershman, J.D.
Commissioner
Connecticut Insurance Department
P.O. Box 816
Hartford, CT 06142-0816

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Hershman:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Trinidad Navarro, Commissioner
Delaware Department of Insurance
1351 West North Street, Suite 101
Dover, DE 19904

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Navarro:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Michael Yaworksy, J.D.
Commissioner
Florida Office of Insurance Regulation
200 East Gaines Street, The Larson Building
Tallahassee, FL 32399

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Yaworksy:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
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July 20, 2026

VIA U.S. MAIL
John F. King
Commissioner
Office of the Commissioner of Insurance and Fire Safety
Two Martin Luther King, Jr. Dr.,
West Tower, Suite 716
Atlanta, GA 30334

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. King:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Scott K. Saiki
Commissioner
Hawaii Department of Commerce & Consumer Affairs
Insurance Division
P.O. Box 3614
Honolulu, HI 96811

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Saiki:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
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www.cmn-law.com

312.281.3604 Direct Line
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July 20, 2026

VIA U.S. MAIL
Dean L. Cameron
Director
Idaho Department of Insurance
700 West State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Cameron:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Ann Gillespie, J.D.
Director
Illinois Department of Insurance
320 W. Washington Street
Springfield, IL 62767

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Gillespie:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Holly W. Lambert
Commissioner
Indiana Department of Insurance
311 W. Washington Street, Suite 103
Indianapolis, IN 46204-2787

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Lambert:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Doug Ommen
Commissioner
Iowa Insurance Division
1963 Bell Avenue, Suite 100
Des Moines, IA 50315

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Ommen:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Vicki Schmidt
Commissioner
Kansas Department of Insurance
1300 SW Arrowhead Rd.
Topeka, KS 66604

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Schmidt:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Sharon P. Clark
Commissioner
Kentucky Department of Insurance
P.O. Box 517
Frankfort, KY 40602-0517

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Clark:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Timothy J. Temple
Commissioner
Louisianna Department of Insurance
P.O. Box 94214
Baton Rouge, LA 70804-9214

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Temple:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

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Attorney at Law

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www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Timothy N. Schott
Acting Superintendent
Bureau of Insurance
Maine Department of Professional & Financial Regulation
34 State House Station
Augusta, ME 04333-0034

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Schott:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Marie Grant, J.D.
Commissioner
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202-2272

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Grant:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

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4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Michael T. Caljouw, J.D.
Commissioner
Division of Insurance
Massachusetts Office of Consumer Affairs and Business Regulation
One Federal Street, Suite 700
Boston, MA 02110-2012

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Caljouw:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Anita G. Fox
Director
Michigan Department of Insurance
And Financial Services
P.O. Box 30220
Lansing, MI 48909-7720

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Fox:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Grace Arnold
Commissioner
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Arnold:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Mike Chaney
Commissioner
Mississippi Insurance Department
P.O. Box 79
Jackson, MS 39502

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Chaney:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Angela Nelson
Director
Missouri Department of Commerce and Insurance
P.O. Box 690
Jefferson City, MO 65102

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Nelson:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

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Attorney at Law

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
James Brown, J.D.
Commissioner and State Auditor
Office of the Montana State Auditor,
Commissioner of Securities and Insurance
840 Helena Avenue
Helena, MT 59601

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Brown:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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July 20, 2026

VIA U.S. MAIL
Eric Dunning
Director
Nebraska Department of Insurance
P.O. Box 95087
Lincoln, NE 68509-5087

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Dunning:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Ned Gaines
Commissioner
Division of Insurance
Nevada Department of Business and Industry
1818 E. College Pkwy, Suite 103
Carson City, NV 89706

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Gaines:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
D.J. Bettencourt
Commissioner
New Hampshire Insurance Department
21 South Fruit Street, Suite 14
Concord, NH 03301

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Bettencourt:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Susan Ochs
Acting Commissioner
Office of the Commissioner
New Jersey Department of Banking & Insurance
P.O. Box 325
Trenton, NJ 08608

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Ochs:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Alice T. Kane
Superintendent
New Mexico Office of Superintendent of Insurance
P.O. Box 1689
Santa Fe, NM 87504-1689

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Kane:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Kaitlin Asrow
Acting Superintendent
New York State Department of Financial Services
One Commerce Plaza
Albany, NY 12257

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Asrow:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Mike Causey
Commissioner
Commissioner's Office
North Carolina Department of Insurance
1201 Mail Service Center
Raleigh, NC 27699-1201

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Causey:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Jon Godfread
Commissioner
North Dakota Insurance & Securities Department
600 E. Boulevard Avenue, Fifth Floor
Bismark, ND 58505-0320

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Godfread:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Judith L. French, J.D.
Director
Ohio Department of Insurance
50 W. Town Street, Suite 300
Columbus, OH 43215

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. French:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
www.cmn-law.com

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Glen Mulready
Commissioner
Oklahoma Insurance Department
400 N.E. 50th Street
Oklahoma City, OK 73105

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Mulready:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
T.K. Keen
Commissioner
Division of Financial Regulation
Oregon Department of Consumer & Business Services
P.O. Box 14480
Salem, OR 97309

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Keen:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
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312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Michael Humphreys
Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Humphreys:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3678 Facsimile
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312.281.3604 Direct Line
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July 20, 2026

VIA U.S. MAIL
Elizabeth Kelleher Dwyer
Director
Division of Insurance
Rhode Island Department of Business Regulation
1511 Pontiac Avenue
Cranston, RI 02920

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Dwyer:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Michael Wise
Director
South Carolina Department of Insurance
P.O. Box 100105
Columbia, SC 29202-3105

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Wise:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

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This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Larry D. Deiter
Director
Division of Insurance
South Dakota Department of Labor & Regulation
124 S. Euclid Avenue, Second Floor
Pierre, SD 57501

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Deiter:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

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Attorney at Law

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www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Lawrence Carter, J.D.
Commissioner
Insurance Division
Tennessee Department of Commerce & Insurance
500 James Robertson Parkway
Davey Crockett Tower, Twelfth Floor
Nashville, TN 37243-0565

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Carter:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Amanda Crawford
Commissioner
Texas Department of Insurance
P.O. Box 12030
Austin, TX 78711-2030

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Crawford:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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July 20, 2026

VIA U.S. MAIL
Jonathan Pike
Commissioner
Utah Insurance Department
4315 S. 2700 W. Suite 2300
Taylosville, UT 84129

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Pike:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Kaj Samson
Commissioner
Vermont Department of Financial Regulation
89 Main Street
Montpelier, VT 05620-3101

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Samson:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Scott A. White
Commissioner
Bureau of Insurance
Virginia State Corporation Commission
P.O. Box 1157
Richmond, VA 23218

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. White:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Patty Kuderer
Commissioner
Washington State Office of the Insurance Commissioner
P.O. Box 40255
Olympia, WA 98504-0255

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Kuderer:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

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312.281.3600 Telephone
312.281.3678 Facsimile
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July 20, 2026

VIA U.S. MAIL
Todd Blanche
Acting Attorney General
Office of the Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Blanche:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of all class members, the states in which they reside, and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Erin K. Hunter
Commissioner
West Virginia Offices of the Insurance Commissioner
P.O. Box 50540
Charleston, WV 25305-0540

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Hunter:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Nathan Houdek
Commissioner
Wisconsin Office of the Commissioner of Insurance
P.O. Box 7873
Madison, WI 53707

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Houdek:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Jeffrey P. Rude
Commissioner
Wyoming Insurance Department
106 E. 6th Avenue
Cheyenne, WY 82002

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Mr. Rude:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy,

including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

6. Settlement Agreement and Release. A copy of this document also is available as Document No. 207-5, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Karima M. Woods
Commissioner
District of Columbia Department of Insurance,
Securities & Banking
1050 First Street, NE, Suite 801
Washington, DC 20002

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Woods:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

5. Proposed Long-Form Settlement Class Notice and proposed Short-Form Settlement Class Notice, each advising members of the proposed settlement of the class action and of their rights to request exclusion from the class action. Copies of these documents also are available at Pages 51 through 60 and 62 through 65 of Document No. 207-5, respectively, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

July 20, 2026

VIA U.S. MAIL
Suzette M. Del Valle
Commissioner
Office of the Commissioner of Insurance
of Puerto Rico
P.O. Box 195415
San Juan, PR 00919-5415

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Del Valle:

The materials and information listed below are submitted on behalf of Transamerica Life Insurance Company pursuant to the notice requirements of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, after a proposed settlement was filed in the above-referenced class action lawsuit:

1. *William F. Wren v. Transamerica Life Insurance Company* - Class Action Complaint and Demand for Jury Trial, including Exhibits A through K. Copies of these documents also are available as Document Nos. 1 and 1-1 through 1-11, at the following Public Access to Electronic Records ("PACER") website for the United States District Court for the Central District of California ("CDCA"): https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

2. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. Copies of these documents also are available as Document Nos. 131 and 131-1 through 131-10, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

3. *William F. Wren and John Murphy v. Transamerica Life Insurance Company* – Corrected Amended Class Action Complaint of Plaintiffs William F. Wren and John Murphy, including Exhibits A through J. A copy of this document is also are available as Document No. 140, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

4. Plaintiffs' Notice of Motion and Unopposed Motion Preliminarily Certifying Settlement Class and Approving Class Action Settlement, which states that a hearing on the Motion will be heard at 9:00 a.m. (Pacific) on August 3, 2026. A copy of this document also is available as Document No. 207, at the following PACER website for the CDCA: https://pacer.uscourts.gov/file-case/court-cmecf-lookup/court/CACDC.

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7. A document identifying the names of class members who reside in your State and the estimated proportionate share of the claims of such members to the entire settlement.

This notice does not include: (a) orders of final judgment or notices of dismissal, or (b) written judicial opinions relating to the materials in Paragraphs 4 through 6 above, as no orders concerning those matters have been entered in the lawsuit.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

Exhibit 2

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mark Fowler, Commissioner
Alabama Department of Insurance
P.O. Box 303351
Montgomery, AL 36130

9590 9402 3766 8032 1925 86

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4451 71

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

RECEIVED BY U.S. MAIL

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JUL 24 2026

DEPARTMENT OF INSURANCE
ACCOUNTING DIVISION

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

---

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Heather Carpenter, Director
Alaska Department of Commerce, Community
& Economic Development
Division of Insurance
P.O. Box 110805
Juneau, AK 99811-0805

9590 9402 3765 8032 5867 20

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4451 64

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

---

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Charles Bassett, J.D., Director
Arizona Department of Insurance
And Financial Institutions
100 N. 15th Avenue, Suite 261
Phoenix, AZ 85007-2630

9590 9402 3765 8032 5861 26

2. Article Number *(Transfer from service label)*

710 5270 3844 4453 31

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jimmy Harris, Commissioner
Arkansas Insurance Department
1 Commerce Way, Building 4
Little Rock, AR 72202

9590 9402 3765 8032 5867 68

2. Article Number *(Transfer from service label)*

7107 5270 3844 4488 20

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Sydne Harris ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Sydne Harris C. Date of Delivery 7/24/24

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Laura Ricardo, Commissioner
California Department of Insurance
300 Capitol Mall, 17th Floor
Sacramento, CA 95814

9590 9402 3765 8032 5867 51

2. Article Number *(Transfer from service label)*

0710 5270 3844 4488 44

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Trinidad Navarro, Commissioner
Delaware Department of Insurance
1351 West North Street, Suite 101
Dover, DE 19904

9590 9402 3765 8032 5873 07

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4489 05

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery 7/23

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Michael Yaworksy, J.D., Commissioner
Florida Office of Insurance Regulation
200 East Gaines Street, The Larson Building
Tallahassee, FL 32399

9590 9402 3765 8032 5868 98

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4489 12

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Scott K. Saiki, Commissioner
Hawaii Department of Commerce & Consumer Affairs
Insurance Division
P.O. Box 3614
Honolulu, HI 96811

9590 9402 3765 8032 5867 13

2. Article Number *(Transfer from service label)*

3090 0002 1999 1726

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Evan Ing C. Date of Delivery JUL 23 2026

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dean L. Cameron, Director
Idaho Department of Insurance
700 West State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720

9590 9402 3765 8032 5868 67

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4489 74

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED BY
JUL 23 2026
CENTRAL POSTAL SERVICE

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ann Gillespie, J.D., Director
Illinois Department of Insurance
320 W. Washington Street
Springfield, IL 62767

9590 9402 3765 8032 5868 50

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4489 81

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)* S. Humphrey

C. Date of Delivery 3-23-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Holly W. Lambert, Commissioner
Indiana Department of Insurance
311 W. Washington Street, Suite 103
Indianapolis, IN 46204-2787

9590 9402 3765 8032 5868 43

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4490 01

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)*

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Re

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Doug Ommen, Commissioner
Iowa Insurance Division
1963 Bell Avenue, Suite 100
Des Moines, IA 50315

9590 9402 3765 8032 5868 36

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4489 67

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)*

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Vicki Schmidt, Commissioner
Kansas Department of Insurance
1300 SW Arrowhead Rd.
Topeka, KS 66604

9590 9402 3765 8032 5868 29

2. [illegible]

PS [illegible]

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

[illegible] Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Sharon P. Clark, Commissioner
Kentucky Department of Insurance
P.O. Box 517
Frankfort, KY 40602-0517

9590 9402 3766 8032 1929 13

2. Article Number (Transfer from service label)
8 3090 0002 1999 1733

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ■ No

DELIVERED
JUL 23 2026

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

ER: COMPLETE THIS SECTION

plete items 1, 2, and 3.
your name and address on the reverse
hat we can return the card to you.
ach this card to the back of the mailpiece,
on the front if space permits.

le Addressed to:

othy J. Temple, Commissioner
isianna Department of Insurance
. Box 94214
on Rouge, LA 70804-9214

590 9402 3766 8032 1925 55

e Number (Transfer from service label)
90 0002 1999 1757

n 3811, July 20[illegible] 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

RECEIVED JUL 30 2026

B. Received by (Printed Name) | C. Date of Deliver

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Exp
☐ Registered Mail
☐ Registered Mail Delivery
■ Return Receipt f. Merchandise
☐ Signature Confir
☐ Signature Conf. Restricted Deli

Domestic Retur

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Michael T. Caljouw, J.D., Commissioner
Division of Insurance
Massachusetts Office of Consumer Affairs and Business Regulation
One Federal Street, Suite 700
Boston, MA 02110-2012

9590 9402 3765 8032 5861 19

2. Article Number *(Transfer from service label)*

7011 1150 0000 9951 305

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* [illegible]

C. Date of Delivery 7-23-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☑ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☑ Return Receipt for Merchandise
☐ Collect on Delivery	☐ Signature Confirmation™
☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery
☐ Insured Mail	
☐ Insured Mail Restricted Delivery (over $500)	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Anita G. Fox, Director
Michigan Department of Insurance
And Financial Services
P.O. Box 30220
Lansing, MI 48909-7720

9590 9402 3765 8032 5869 28

2. Article Number *(Transfer from service label)*

7018 0000 1999 1689

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

DTMB Delivery Services
Agent for State of Michigan

3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☑ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☑ Return Receipt for Merchandise
☐ Collect on Delivery	☐ Signature Confirmation™
☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery
☐ Insured Mail	
☐ Insured Mail Restricted Delivery (over $500)	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Grace Arnold, Commissioner
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

9590 9402 3765 8032 5863 48

2. Article Number *(Transfer from service label)*

0710 5270 3844 4490 63

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☑ Agent ☐ Addressee

B. Received by *(Printed Name)* Lucas Grathwohl C. Date of Delivery 7-22-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☑ No

3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☑ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☑ Return Receipt for Merchandise
☐ Collect on Delivery	☐ Signature Confirmation™
☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery
☐ Insured Mail	
☐ Insured Mail Restricted Delivery (over $500)	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mike Chaney, Commissioner
Mississippi Insurance Department
P.O. Box 79
Jackson, MS ~~39502~~ 39205

9590 9402 3765 8032 5859 83

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4490 70

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Angela Nelson, Director
Missouri Department of Commerce and Insurance
P.O. Box 690
Jefferson City, MO 65102

9590 9402 3765 8032 5866 83

2. Article Number *(Transfer from service label)*

18 1830 0000 3607 4332

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Doug Platter ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Doug Platter | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

MAIN POST OFFICE JEFFERSON CITY, MO 65101
JUL 27 2026

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

James Brown, J.D., Commissioner and State Auditor
Office of the Montana State Auditor, Commissioner of Securities and Insurance
840 Helena Avenue
Helena, MT 59601

9590 9402 3765 8032 5861 64

2. Article Number *(Transfer from service label)*

89 0710 5270 3844 4490 87

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

State Auditor James Brown
Insurance/Securities Commissioner
840 Helena Avenue
Helena, MT 59601

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Eric Dunning, Director
Nebraska Department of Insurance
P.O. Box 95087
Lincoln, NE 68509-5087

9590 9402 3765 8032 5866 76

2. Article Number *(Transfer from service label)*

0181 1830 0000 3607 4356

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Jody M. Schmale ☑ Agent ☐ Addressee

B. Received by *(Printed Name)* Jody M. Schmale

C. Date of Delivery 7/23/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

UNCOLN NE 68509
JUL 23 2026
USPS

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ned Gaines, Commissioner
Division of Insurance
Nevada Department of Business and Industry
1818 E. College Pkwy, Suite 103
Carson City, NV 89706

9590 9402 3765 8032 5863 24

2. Article Number *(Transfer from service label)*

9 0710 5270 3844 4450 58

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED
JUL 23 2026
DIVISION OF INSURANCE
STATE OF NEVADA

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

D.J. Bettencourt, Commissioner
New Hampshire Insurance Department
21 South Fruit Street, Suite 14
Concord, NH 03301

9590 9402 3765 8032 5863 17

2. Article Number *(Transfer from service label)*

243

COMPLETE THIS SECTION ON DELIVERY

A. Signature

NH INSURANCE DEPARTMENT
X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery 8/03/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Susan Ochs, Acting Commissioner
Office of the Commissioner
New Jersey Department of Banking & Insurance
P.O. Box 325
Trenton, NJ ~~08608~~ 08625

9590 9402 3765 8032 5866 69

2. Article Number *(Transfer from service label)*

7018 1830 0000 3607 4363

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 — Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Alice T. Kane, Superintendent
New Mexico Office of Superintendent of Insurance
P.O. Box 1689
Santa Fe, NM 87504-1689

9590 9402 3765 8032 5866 52

2. Article Number *(Transfer from service label)*

9 1830 0000 3607 4370

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X MARIANO ROMERO

☐ Agent
☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

JUL 24 2026

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Mariano Romero

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 — Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Kaitlin Asrow, Acting Superintendent
New York State Department of Financial Services
One Commerce Plaza
Albany, NY 12257

9590 9402 3765 8032 5863 00

2. Article Number *(Transfer from service label)*

0710 5270 3844 4450 65

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 — Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mike Causey, Commissioner
Commissioner's Office
North Carolina Department of Insurance
1201 Mail Service Center
Raleigh, NC 27699-1201

9590 9402 3765 8032 5862 94

2. Article Number *(Transfer from service label)*
9 0710 5270 3844 4490 94

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
Kimberly W. Pearce ☑ Agent ☐ Addressee

B. Received by *(Printed Name)* Kimberly W. Pearce C. Date of Delivery 7/23/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
Signature Confirmation™
nature Confirmation
ted Delivery

rn Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Jon Godfread, Commissioner
North Dakota Insurance & Securities Department
600 E. Boulevard Avenue, Fifth Floor
Bismark, ND 58505-0320

9590 9402 3765 8032 5862 87

2. Article Number *(Transfer from service label)*
9 0710 5270 3844 4450 10

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery 7-24-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Judith L. French, J.D., Director
Ohio Department of Insurance
50 W. Town Street, Suite 300
Columbus, OH 43215

9590 9402 3765 8032 5862 70

2. Article Number *(Transfer from service label)*
9589 0710 5270 3844 4450 72

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JUL 27 2026

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
nsured Mail Restricted Delivery over $500)
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Glen Mulready, Commissioner
Oklahoma Insurance Department
400 N.E. 50th Street
Oklahoma City, OK 73105

9590 9402 3765 8032 5862 63

2. Article Number (Transfer from service label)
9 0710 5270 3844 4451 02

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Peggy Kelly ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED
FRONT DESK
JUL 23 2026
OKLAHOMA INSURANCE DEPT.

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
T.K. Keen, Commissioner
Division of Financial Regulation
Oregon Department of Consumer & Business Services
P.O. Box 14480
Salem, OR 97309

9590 9402 3765 8032 5866 90

2. Article Number (Transfer from service label)
7018 1830 0000 3607 4387

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Lenny Wood ☐ Agent ☑ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Michael Humphreys, Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

9590 9402 3765 8032 5862 56

2. Article Number (Transfer from service label)
9589 0710 5270 3844 4450 89

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature Signature on file
X With USPS 17107 ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery
JUL 24 2026

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
■ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
■ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Elizabeth Kelleher Dwyer, Director
Division of Insurance
Rhode Island Department of Business Regulation
1511 Pontiac Avenue
Cranston, RI 02920

9590 9402 3765 8032 5862 49

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4450 96

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X JOHN BUCO ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* RI DLT C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JUL 24 2026

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

chael Wise, Director
ith Carolina Department of Insurance
P. Box 100105
Columbia, SC 29202-3105

+02 3765 8032 5866 45

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4453 48

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Tina McFalls ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Tina McFalls C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Larry D. Deiter, Director
Division of Insurance
South Dakota Department of Labor & Regulation
124 S. Euclid Avenue, Second Floor
Pierre, SD 57501

9590 9402 3765 8032 5862 32

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4450 34

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X CENTRAL MAIL SERVICES 1320 E SIOUX AVE ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* JUL 24 2026 C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

PIERRE SD 57501

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lawrence Carter, J.D., Commissioner
Insurance Division
Tennessee Department of Commerce & Insurance
500 James Robertson Parkway
Davey Crockett Tower, Twelfth Floor
Nashville, TN 37243-0565

9590 9402 3765 8032 5862 25

2. Article Number (Transfer from service label)

9589 0710 5270 3844 4451 19

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Amanda Crawford, Commissioner
Texas Department of Insurance
P.O. Box 12030
Austin, TX 78711-2030

9590 9402 3765 8032 5866 38

2. Article Number (Transfer from service label)

9589 0710 5270 3844 4453 62

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jonathan Pike, Commissioner
Utah Insurance Department
4315 S. 2700 W. Suite 2300
Taylosville, UT 84129

9590 9402 3765 8032 5861 40

2. Article Number (Transfer from service label)

9589 0710 5270 3844 4451 26

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery
7/23/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JUL 23 2026
84129 USPS

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Kaj Samson, Commissioner
Vermont Department of Financial Regulation
89 Main Street
Montpelier, VT 05620-3101

9590 9402 3765 8032 5862 01

2. Article Number *(Transfer from service label)*

0710 5270 3844 4451 40

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Scott A. White, Commissioner
Bureau of Insurance
Virginia State Corporation Commission
P.O. Box 1157
Richmond, VA 23218

9590 9402 3765 8032 5866 21

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4452 01

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Dal Quan Suitte ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* JUL 23 2026 | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Patty Kuderer, Commissioner
Washington State Office of the Insurance Commissioner
P.O. Box 40255
Olympia, WA 98504-0255

9590 9402 3765 8032 5866 14

2. Article Number *(Transfer from service label)*

7011 1150 0000 9951 30

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

JUL 24 2026
PO BOX 41050
Olympia WA 98504-1050

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Erin K. Hunter, Commissioner
West Virginia Offices of the Insurance Commissioner
P.O. Box 50540
Charleston, WV 25305-0540

9590 9402 3765 8032 5866 07

2. Article Number *(Transfer from service label)*

7011 1150 0000 9951 304

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Nathan Houdek, Commissioner
Wisconsin Office of the Commissioner of Insurance
P.O. Box 7873
Madison, WI 53707

9590 9402 3765 8032 5865 91

2. Article Number *(Transfer from service label)*

7011 1150 0000 9951 3036

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* | C. Date of Delivery JUL 2 2026

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeffrey P. Rude, Commissioner
Wyoming Insurance Department
106 E. 6th Avenue
Cheyenne, WY 82002

9590 9402 3765 8032 5861 95

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4451 57

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Scott Hall | C. Date of Delivery 7-23-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Karima M. Woods, Commissioner
District of Columbia Department of Insurance, Securities & Banking
1050 First Street, NE, Suite 801
Washington, DC 20002

9590 9402 3766 8032 1903 60

2. Article Number *(Transfer from service label)*

9589 0710 5270 3844 4488 82

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Alfonzo Duckett

C. Date of Delivery 7-24-26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Suzette M. Del Valle, Commissioner
Office of the Commissioner of Insurance of Puerto Rico
P.O. Box 195415
San Juan, PR 00919-5415

9590 9402 3765 8032 5865 84

2. Article Number *(Transfer from service label)*

7018 1830 0000 3607 4257

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* [illegible]

C. Date of Delivery 7/24/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☑ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ■ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ■ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

Exhibit 3

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D...

USPS Tracking®

FAQs >

Remove ✕

Tracking Number:

9589071052703844448868

Copy Add to Informed Delivery

Latest Update

Your item was delivered to an individual at the address at 11:56 am on July 23, 2026 in DENVER, CO 80202.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

DENVER, CO 80202
July 23, 2026 11:56 AM

Out for Delivery

DENVER, CO 80202
July 23, 2026 6:10 AM

Arrived at Post Office

DENVER, CO 80202
July 23, 2026 4:39 AM

Arrived at USPS Facility

DENVER, CO 80202
July 23, 2026 1:11 AM

Departed USPS Facility

DENVER CO DISTRIBUTION CENTER

July 23, 2026 12:50 AM

Arrived at USPS Facility
DENVER CO DISTRIBUTION CENTER
July 22, 2026 8:15 PM

Departed USPS Facility
DENVER CO DISTRIBUTION CENTER
July 22, 2026 8:08 PM

Arrived at USPS Facility
DENVER CO DISTRIBUTION CENTER
July 22, 2026 4:48 AM

Arrived at USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 20, 2026 10:14 PM

Departed Post Office
CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item
CHICAGO, IL 60604
July 20, 2026 4:29 PM

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Enter tracking or barcode numbers

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FAQs

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D...

USPS Tracking®

FAQs >

Remove ✕

Tracking Number:

70183090000219991696

Copy Add to Informed Delivery

Latest Update

Your item has been delivered and is available at a PO Box at 10:10 am on July 24, 2026 in HARTFORD, CT 06142.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, PO Box

HARTFORD, CT 06142
July 24, 2026 10:10 AM

Available for Pickup

HARTFORD, CT 06142
July 23, 2026 11:03 AM

Arrived at Post Office

HARTFORD, CT 06101
July 23, 2026 10:09 AM

Arrived at USPS Facility

WARRENDALE PA DISTRIBUTION CENTER
July 21, 2026 4:00 PM

Arrived at USPS Facility

CHICAGO IL DISTRIBUTION CENTER

July 20, 2026 10:10 PM

Departed Post Office

CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item

CHICAGO, IL 60604
July 20, 2026 3:35 PM

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FAQs

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D...

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FAQs >

Remove ×

Tracking Number:

9589071052703844445218

Copy Add to Informed Delivery

Latest Update

Your item was picked up at the post office at 6:31 am on July 28, 2026 in WASHINGTON, DC 20530.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Delivered

Delivered, Individual Picked Up at Post Office
WASHINGTON, DC 20530
July 28, 2026 6:31 AM

Redelivery Scheduled for Next Business Day
WASHINGTON, DC 20018
July 23, 2026 12:51 PM

Arrived at Post Office
WASHINGTON, DC 20018
July 23, 2026 5:23 AM

Arrived at USPS Facility
WASHINGTON DC DISTRIBUTION CENTER
July 23, 2026 3:04 AM

Departed USPS Facility
WASHINGTON DC DISTRIBUTION CENTER

July 23, 2026 2:39 AM

Arrived at USPS Facility

WASHINGTON DC DISTRIBUTION CENTER
July 22, 2026 7:38 PM

Arrived at USPS Facility

WASHINGTON DC DISTRIBUTION CENTER
July 22, 2026 12:38 PM

Arrived at USPS Facility

WASHINGTON DC DISTRIBUTION CENTER
July 22, 2026 10:12 AM

In Transit to Next Facility

July 22, 2026 9:11 AM

Departed USPS Facility

GAITHERSBURG MD DISTRIBUTION CENTER
July 22, 2026 8:48 AM

Arrived at USPS Facility

GAITHERSBURG MD DISTRIBUTION CENTER
July 22, 2026 8:09 AM

In Transit to Next Facility

July 22, 2026 5:39 AM

Departed USPS Facility

WARRENDALE PA DISTRIBUTION CENTER
July 22, 2026 3:37 AM

Arrived at USPS Facility

WARRENDALE PA DISTRIBUTION CENTER
July 21, 2026 1:33 PM

In Transit to Next Facility

July 21, 2026 12:12 PM

In Transit to Next Facility

July 21, 2026 7:02 AM

In Transit to Next Facility

July 21, 2026 2:21 AM

Departed USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 20, 2026 11:49 PM

Arrived at USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 20, 2026 10:14 PM

Departed Post Office
CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item
CHICAGO, IL 60604
July 20, 2026 4:14 PM

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FAQs

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D...

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FAQs >

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Tracking Number:

9589071052703844448936

Copy Add to Informed Delivery

Latest Update

Your item has been delivered and is available at a PO Box at 8:00 am on July 22, 2026 in ATLANTA, GA 30334.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Delivered

Delivered, PO Box

ATLANTA, GA 30334
July 22, 2026 8:00 AM

Arrived at USPS Facility

ATLANTA GA DISTRIBUTION CENTER
July 22, 2026 1:54 AM

Departed USPS Facility

ATLANTA GA DISTRIBUTION CENTER
July 22, 2026 1:21 AM

Arrived at USPS Facility

ATLANTA GA DISTRIBUTION CENTER
July 21, 2026 10:55 PM

Arrived at USPS Facility

CHICAGO IL DISTRIBUTION CENTER

July 20, 2026 10:14 PM

Departed Post Office

CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item

CHICAGO, IL 60604
July 20, 2026 3:15 PM

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FAQs

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D…

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FAQs >

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Tracking Number:

9589071052703844449049

Copy Add to Informed Delivery

Latest Update

Your item was picked up at the post office at 7:33 am on July 23, 2026 in AUGUSTA, ME 04333.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Individual Picked Up at Post Office
AUGUSTA, ME 04333
July 23, 2026 7:33 AM

Arrived at Post Office
AUGUSTA, ME 04330
July 23, 2026 6:48 AM

Arrived at USPS Facility
WARRENDALE PA DISTRIBUTION CENTER
July 21, 2026 1:12 PM

In Transit to Next Facility
July 21, 2026 11:58 AM

In Transit to Next Facility
July 21, 2026 8:11 AM

In Transit to Next Facility

July 21, 2026 4:39 AM

Departed USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 21, 2026 1:38 AM

Arrived at USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 20, 2026 10:03 PM

Departed Post Office
CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item
CHICAGO, IL 60604
July 20, 2026 3:56 PM

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Enter tracking or barcode numbers

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FAQs

ALERT: IMPACTS FROM HURRICANE POLO IN THE SOUTHWEST REGION OF THE U.S. MAY D...

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FAQs >

Remove ✕

Tracking Number:

9589071052703844449032

Copy Add to Informed Delivery

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 1:57 pm on July 23, 2026 in BALTIMORE, MD 21202.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Front Desk/Reception/Mail Room
BALTIMORE, MD 21202
July 23, 2026 1:57 PM

Out for Delivery
BALTIMORE, MD 21202
July 23, 2026 6:51 AM

Arrived at Post Office
BALTIMORE, MD 21202
July 23, 2026 6:40 AM

Arrived at USPS Facility
WARRENDALE PA DISTRIBUTION CENTER
July 21, 2026 1:12 PM

In Transit to Next Facility

July 21, 2026 11:58 AM

In Transit to Next Facility
July 21, 2026 8:11 AM

In Transit to Next Facility
July 21, 2026 4:39 AM

Departed USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 21, 2026 1:38 AM

Arrived at USPS Facility
CHICAGO IL DISTRIBUTION CENTER
July 20, 2026 10:06 PM

Departed Post Office
CHICAGO, IL 60604
July 20, 2026 5:46 PM

USPS in possession of item
CHICAGO, IL 60604
July 20, 2026 4:00 PM

Hide Tracking History

What Do USPS Tracking Statuses Mean?

Text & Email Updates

USPS Tracking Plus®

Product Information

See Less

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

Exhibit 4

KATHY HOCHUL
Governor

KAITLIN ASROW
Acting Superintendent

July 24, 2026

Chitenden Murday & Nvotny LLC

303 West Madison Street, Suite 2400
Chicago, Illinis 60606

RE: CASE No 5:21-cv-00178

We are returning the enclosed service of process because it fails to comply with the New York Insurance Law.

1. We have no authority to accept service of process for an action which is generated in a court outside of the state of New York.

PHD PHD
NYS Department of Financial Services, Corporate Affairs Unit, Corporate.Affairs@dfs.ny.gov

Exhibit 5

CHITTENDEN, MURDAY & NOVOTNY LLC

Elizabeth G. Doolin
Attorney at Law

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3604 Direct Line
edoolin@cmn-law.com

August 4, 2026

VIA U.S. MAIL
Kaitlin Asrow
Acting Superintendent
New York State Department of Financial Services
One State Street Plaza
New York, NY 10004-1511

Re: ***Wren, et al v. Transamerica Life Insurance Company***
United States District Court for the Central District of California
Case No. 5:21-cv-00178-JGB-SP

Dear Ms. Asrow:

We are enclosing on behalf of Transamerica Life Insurance Company the materials and information called for by the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715(b), following the filing of a proposed settlement in the above-referenced class action lawsuit.

We originally submitted the enclosed CAFA materials to you via certified mail under cover of a letter dated July 20, 2026. At the direction of an individual answering the main number for the Department of Financial Services (212.709.3500), we sent those materials to you at One Commerce Plaza, Albany, NY 12257. A copy of that letter is enclosed. Your office returned the CAFA materials to us stating in a letter dated July 24, 2026 that, "We have no authority to accept service of process for an action which is generated in a court outside of the [S]tate of New York." A copy of that letter also is enclosed.

To be clear, your office is not being asked to accept service of process for a lawsuit. The enclosed materials are simply being submitted to you pursuant to CAFA, as you are the "appropriate State official" to receive them on behalf of the State of New York. *See* 28 U.S.C. § 1715(a)(2) and (b).

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Elizabeth G. Doolin

Elizabeth G. Doolin
Counsel for Transamerica Life Insurance Company

EGD:jp
Enclosures

Exhibit 6

CHITTENDEN, MURDAY & NOVOTNY LLC

Joseph R. Jeffery
Attorney at Law
Licensed in Illinois & Missouri

303 West Madison Street
Suite 2400
Chicago, Illinois 60606
312.281.3600 Telephone
312.281.3678 Facsimile
www.cmn-law.com

312.281.3627 Direct Line
jjeffery@cmn-law.com

September 16, 2026

VIA FEDEX DELIVERY
David Casler
Senior Enforcement Counsel
Department of Financial Services
1 State Street, New York, NY 10004
david.casler@dfs.ny.gov

Dear Mr. Casler:

Thank you for your time in our call today. Per our discussion, I am enclosing copies of the materials and information our client, Transamerica Life Insurance Company, originally supplied to your office under cover of our letter dated July 20, 2026, which letter is enclosed for your convenience. The materials were submitted to the Department of Financial Services pursuant to the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, and were returned to us due to a misapprehension of the materials' significance.

Please let us know if you have any questions concerning these matters.

Very truly yours,

/s/ Joseph R. Jeffery

Joseph R. Jeffery

JRJ:jp
Enclosures