

**NOTICE OF  
CLASS ACTION SETTLEMENT**

*Savage/Tow v. GEICO Indemnity Co., Case No. SUCV2024000382)*  
*(Superior Court of Lumpkin County, Georgia)*

**A COURT AUTHORIZED THIS NOTICE.  
THIS IS NOT A SOLICITATION FROM A LAWYER.  
YOU ARE NOT BEING SUED.**

**If You Made a Total Loss Claim on Your Georgia Automobile Insurance Policy with GEICO Indemnity Company or other GEICO entities between September 16, 2019 to August 8, 2024, you may be a member of the Settlement Class in this class action lawsuit.**

The Parties in this class action lawsuit, Plaintiffs Jennifer Savage and Ricky Tow (also referred to as the Class Representatives), and Defendant insurance company GEICO Indemnity Company and all its affiliated entities writing personal automobile insurance policies in Georgia (“Insurers”), reached a Proposed Settlement on behalf of a Settlement Class which the Court preliminarily approved in a Preliminary Approval Order.

**What is this class action lawsuit about?** The Class Representatives sued alleging that GEICO Indemnity Company breached its insurance contracts by failing to fully compensate Georgia automobile insurance policyholders for License Plate Registration Transfer Fees when settling first-party total loss claims between September 16, 2019 and August 8, 2024.

The Insurers denied and continue to deny the allegations against them. Rather than continuing to litigate the matter, the Parties have reached a Proposed Settlement.

**Your legal rights are affected whether you act or don’t act. The deadlines to exercise these rights are explained in this notice. Read carefully:**

| <b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:</b> |   |
|---|---|
| <b>SUBMIT A CLAIM FORM</b>                            | The only way to receive a settlement payment, to the extent that you are entitled to one, is to timely submit a valid claim online. The deadline to submit a claim form is August 6, 2026.                              |
| <b>OBJECT</b>   | Write to the Court about why you don’t like the Proposed Settlement. The deadline to object to the Proposed Settlement is July 22, 2026.  |
| <b>OPT OUT</b>  | Write to the Settlement Administrator about why you do not wish to be a part of the Settlement Class or Proposed Settlement.  |
| <b>DO NOTHING</b>                                     | If you do nothing, you will <u>not</u> receive a settlement payment. But you will give up your right to sue the Insurers about the legal claims in this case. To receive a settlement payment, you must submit a claim. |

These rights and options—and the deadlines to exercise them—are explained in this Notice.

Questions? Visit [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com) or call toll-free at 1-833-380-5566

## BASIC INFORMATION

### 1. What is the lawsuit about?

Plaintiffs allege that GEICO Indemnity Company breached its insurance contracts by failing to fully compensate Georgia automobile insurance policyholders for License Plate Registration Transfer Fees when settling first-party total loss claims for License Plate Registration Transfer Fees between September 16, 2019 and August 8, 2024. GEICO Indemnity Company denied and continues to deny the allegations against it. The parties have reached a Settlement Agreement that provides for a Proposed Settlement.

### 2. Why is this a class action?

In a class action lawsuit one or more people, called the “Plaintiff” or “Class Representative,” represent a larger group of people called “Class Members” or the “Class” who may have similar claims against the “Defendants.” In a class action, one court resolves the specific issues in dispute for all Class Members, except those who exclude themselves from the Class.

Here, the Court has preliminarily decided that this lawsuit can be certified as a class action for settlement purposes only under the Georgia Rules governing class actions. Specifically, the Court found that for settlement purposes the Class Members are sufficiently numerous, there are questions of law and fact that are common to all Class Members that predominate over questions affecting individual Class Members, the Class Representative’s claims are typical of those of the Class, the Class Representative and Class Counsel are adequate to represent the Class, and proceeding as a Class is superior to the alternatives. The Settlement Agreement provides for a Settlement Class such that class certification shall be for settlement purposes only. More information about why the Court is allowing this lawsuit to be a class action for settlement purposes is in the Court’s Preliminary Approval Order, which is available at: [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com).

### 3. Why is there a settlement?

Both sides agreed to a compromise settlement to avoid the cost and risk of a trial and a possible appeal. The Settlement also ensures that the class members affected will get compensation and relief to the extent that they qualify and timely submit a claim. In return, the Insurers get a general release of all claims for regulatory fees (including title and registration fees) that arise out of or relate to the total loss claims in the Class Period. The Class Representatives and Class Counsel believe the Settlement is in the best interests of everyone affected.

## WHO IS IN THE SETTLEMENT?

### 4. How do I know if I am part of the settlement?

The parties have reached a settlement, which defines the settlement class (the “Class” or “Settlement Class” or “Class Members”) as:

All Georgia insureds: (1) under a personal automobile insurance policy issued by GEICO Indemnity Company and other GEICO entities that underwrite personal automobile insurance in Georgia (collectively, “GEICO”); who (2) submitted a

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first-party auto physical damage claim to GEICO during between September 16, 2019 and August 8, 2024 (3) that was accepted and paid by GEICO as a total loss under the policy's comprehensive or collision coverage; and (4) did not receive \$5 in License Plate Registration Transfer Fees ("License Fees") in the settlement of their claim.

Settlement Class Members will be identified exclusively based on information in the Insurers' records.

If you received notice of the Settlement by email, then the parties believe that you may be a member of the Settlement Class based upon the Insurers' records.

#### **5. What if I'm still not sure if I am included?**

If you still are not sure whether you are included in the Settlement as a Settlement Class Member, you can get additional information at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com) or obtain free assistance by calling the Settlement Administrator appointed by the Court at 1-833-380-5566.

### **THE SETTLEMENT BENEFITS — WHAT YOU CAN GET**

#### **6. What does the settlement provide?**

Pursuant to the terms of the Proposed Settlement, the Insurers will provide compensation only to those Settlement Class Members who submit complete, timely, and valid claims.

#### **7. What can I get from the settlement?**

Settlement Class Members who submit a complete, valid and timely Claim will receive a settlement payment of up to five dollars (\$5.00) in License Plate Registration Transfer Fees. Payments to Settlement Class Members who submit valid claims will be reduced by the amount of any license or registration fee payments made by GEICO as part of the settlement of their total loss claim and the Settlement Class Members' pro rata share of any attorneys' fees and attorneys' costs awarded by the Court.

### **HOW YOU GET A SETTLEMENT PAYMENT – SUBMITTING A CLAIM FORM**

#### **8. How can I get a settlement payment?**

To qualify for a settlement payment, you must submit a completed and signed Claim by August 6, 2026. You must electronically file the Claim at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com) according to the instructions on the website. Claims must be submitted electronically through the settlement website by 11:59 p.m. EST on August 6, 2026.

To receive instructions on submitting a Claim, please contact the Settlement Administrator at 1-833-380-5566 or visit [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com).

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**9. How many claim forms should I submit if I have multiple policies?**

If you had multiple total loss claims during the Class Period, submit a claim for each total loss claim.

**10. Do I need to submit any documents or information with the Claim?**

You do not need to submit any documentation with your Claim. The Claim is simple to complete and tells you exactly what information you need to submit. Make sure you follow all instructions on the Claim. If you need any assistance completing the Claim or need any instructions regarding the Claim, please call the Settlement Administrator at 1-833-380-5566 or visit [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com).

**11. When would I get my payment?**

The Court will hold a final fairness hearing on September 9, 2026 at 1:30 p.m. Eastern time to decide whether to finally approve the Settlement. If the Court approves the Settlement, there could be appeals. If there are any appeals, these appeals could delay payment of claims, possibly for more than a year. Updates will be provided online at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com).

**12. What claims are being released by Settlement Class Members?**

Under the Settlement, “Released Claims” means any and all known and Unknown Claims, rights, demands, allegations, actions, suits or causes of action of whatever kind or nature, whether ex contractu or ex delicto, debts, liens, liabilities, agreements, interests, costs, expenses, attorneys’ fees, losses or damages (whether actual, consequential or treble) statutory, common law or equitable, including but not limited to breach of contract, bad faith or extra-contractual claims, and claims for punitive or exemplary damages, or prejudgment or postjudgment interest, arising from or relating in any way to the Insurers’ alleged non-payment or underpayment of regulatory fees (including title and registration fees), with respect to any Settlement Class Member Claims for a total loss vehicle during the Class Period under an automobile insurance policy issued by the Insurers’ in Georgia based on any legal theory whatsoever to the fullest extent of the law and res judicata and/or claim preclusion protections. “Unknown Claims” means any unknown Released Claims arising out of facts found hereafter to be other than or different from the facts now believed to be true and relating to claims for regulatory fees to the full extent permitted by law and to the full extent of res judicata and/or claim preclusion protection.

Under the Settlement, the “Released Persons” means the Insurers and any of their members, parents, subsidiaries, affiliates, managers, past, present or future officers, stockholders, attorneys, insurers, reinsurers, excess insurers, directors, agents, employees and/or independent contractors, and/or any other successors, assigns, divisions, or legal representatives thereof, and any other Person or entity who or which might be liable on the basis of any conduct by any of the foregoing.

## IF YOU DO NOTHING

### 13. What happens if I do nothing at all?

If you do nothing, you'll get no money from the Settlement and you will release all claims against the Released Persons about the legal issues in this case, as discussed above.

## THE LAWYERS REPRESENTING YOU

### 14. Do I have a lawyer in this case?

Yes. The Court appointed the following lawyers to represent all the members of the Settlement Class:

|   |  |  |
|---|--|--|
| R. Brent Irby<br><b>LYONS IRBY, LLC</b><br><a href="mailto:brent@lyonsirby.com">brent@lyonsirby.com</a><br>2201 Arlington Ave. S<br>Birmingham, AL 35205<br>Telephone: (205) 936-8281 | William Greg Dobson<br>Michael J. Lober<br><b>LOBER &amp; DOBSON, LLC</b><br>Robert E. Lee Building, St 201<br>830 Mulberry Street<br>Macon, Georgia 31201<br>Telephone: (478)745-7700 | Todd L. Lord<br><b>LAW OFFICE OF<br/>TODD L. LORD</b><br>Post Office Box 901<br>4 Courthouse Square<br>Cleveland, Georgia 30528<br>Telephone: 706-219-2239 |
|---|--|--|

These lawyers are called Class Counsel. You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

### 15. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel are working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. You can ask him or her to appear in Court for you in this case if you want someone other than Class Counsel to speak for you.

### 16. How will the lawyers be paid?

Under the terms of the Settlement, the lawyers can ask the Court for an award of attorneys' fees and reimbursement of litigation expenses up to \$158,333. This award is to compensate and reimburse the multiple law firms that have litigated this case for two years, expending hours of attorney time pursuing this case on behalf of the Class and the Settlement Class.

### 17. Will the Class Representatives receive compensation?

Yes. The Class Representatives will each receive a service award of \$2,000 to compensate them for their services and efforts in bringing the lawsuit. The Court will make the final decision as to the amount, if any, to be paid to the Class Representatives. Any service award will NOT reduce the money available to Settlement Class Members who submit valid and timely claims.

## OPTING OUT OF THE CLASS ACTION

### 18. How do I “opt out” of or exclude myself from the Class Action?

You have an opportunity to exclude yourself from or “opt-out” of the Settlement Class and the Class Settlement. If you do not wish to participate in this Class Settlement, you should write to the Settlement Administrator stating an intention to “opt out” of or exclude yourself from the Settlement Class. Written notice must be provided to the following:

Savage/Tow Class Action Settlement  
c/o JND Legal Administration  
P.O. Box 91239  
Seattle, WA 98111

Settlement Class Members who wish to exclude themselves from the Settlement Class must submit timely and written requests for exclusion. To be effective, such a request must include the Settlement Class Member’s name and address, total loss claim number or Claim ID, an unequivocal statement that the Settlement Class Member wishes to be excluded from the Settlement Class, and the signature of the Settlement Class Member or the Legally Authorized Representative of the Settlement Class Member. Requests for exclusion must be exercised individually by the Settlement Class Member and are only effective as to the individual Settlement Class Member requesting exclusion.

This written notice must be sent to the Settlement Administrator **not later than July 22, 2026**.

Any attempt to opt out by notice to the Clerk of the Court, the Court, or any person other than the Settlement Administrator shall be of no effect. Any attempt to opt out that is not sent to the Settlement Administrator within the deadlines set forth in the Settlement Agreement shall be of no effect.

## OBJECTING TO THE SETTLEMENT

### 19. How do I object to the Court if I don’t like the settlement?

If you’re a Settlement Class Member and do not opt out of the Settlement, you may object to any part of the Proposed Settlement, and the Court will consider your views. You must submit any objection in writing. The procedures for submitting written objections are set out below. **A written objection (and any support for it) must be filed with the Clerk of Court and received no later than July 22, 2026 (the “Objection Deadline”) by all the following:**

|   |   |
|---|---|
| Clerk of Court<br>325 Riley Road<br>Dahlonega, GA 30533   | R. Brent Irby<br><b>LYONS IRBY, LLC</b><br>2201 Arlington Avenue South<br>Birmingham, Alabama 35205               |
| Savage/Tow Class Action Settlement<br>c/o JND Legal Administration<br>P.O. Box 91239<br>Seattle, WA 98111 | Kymerly Kochis<br><b>EVERSHEDS SUTHERLAND (US) LLP</b><br>1114 Avenue of the Americas<br>New York, New York 10036 |

Questions? Visit [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com) or call toll-free at 1-833-380-5566

If you hire an attorney in connection with making an objection, that attorney must file with the Court and serve on the counsel identified above a notice of appearance. **The notice of appearance must be filed with the Court and received by the addressees above no later than the Objection Deadline.** If you do hire your own attorney, you will be responsible for payment of all fees and expenses that the attorney incurs on your behalf. If you want to object, you must file your objection in writing to the Court. Your objection *must* include:

- (a) a caption or title that identifies it as “Objection to Class Settlement” in “*Savage/Tow v. GEICO*, Case No. SUCV2024000382 (Superior Court of Lumpkin County, Georgia)”;
- (b) your full name, signature, home address and telephone number, or other information sufficient to identify the Settlement Class Member;
- (c) a notice of intention to appear, either in person or through an attorney, with the name, address, and telephone number of the attorney, if any, who will appear;
- (d) certification that you are a member of the Settlement Class;
- (e) a statement of each objection(s) asserted;
- (f) a detailed description of the basis and facts underlying and supporting each objection;
- (g) a detailed description of the legal authorities, if any, underlying and supporting each objection;
- (h) copies of exhibits and/or affidavits, if any, you may offer during the hearing;
- (i) a list of all witnesses, if any, you may call to testify at the hearing, along with a summary of each witness’s anticipated testimony;
- (j) the signature, full name, firm name, and business address of all attorneys who have a financial interest in the objection;
- (k) the last four digits of your policy number(s) for your Georgia automobile policies with Defendants or other documentary proof of membership in the Settlement Class; and
- (l) disclosure of any other class action settlements to which you or any or your agents or representatives, successors or predecessors have objected, including disclosing the number of times you have objected to a class action settlement within the preceding five years, the caption of each case, the counsel representing you in each prior objection, and a copy of any orders related to any prior objections.

If you make a written objection to the Settlement as set out above, you may request to speak - either in person or through an attorney hired at your own expense - at the Final Fairness Hearing the Court has set to consider whether to give final approval to the Settlement Agreement. You are not required to attend the hearing. Lack of attendance at the Final Fairness Hearing will not prevent the Court from considering your objection. If you (or your attorney) intend to speak at the Final Fairness Hearing, you must file with the Court and serve on the parties identified above a notice

of intent to appear, and your attorney (if you hire one) must file a notice of appearance with the Clerk of Court. Again, the notice of intent to appear must be filed with the Court, and received by the parties above, no later than the Objection Deadline.

If you do not file an objection as described above, you will be deemed to have waived any and all objections to the Settlement, to have consented to the Court's certification of and jurisdiction over the Settlement Class, and to have released the claims as defined in the Settlement Agreement (which is available online at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com)).

## THE COURT'S FAIRNESS HEARING

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

**The Court will hold a Final Fairness Hearing at 1:30 p.m. Eastern Time on September 9, 2026**, at the Lumpkin County Courthouse, 325 Riley Rd, Dahlonega, GA 30533. At this hearing, the Court will consider whether the Proposed Settlement is fair, reasonable and adequate. **You are not required to attend the hearing but may do so if you wish.** If there are objections that have been submitted in writing in advance of the hearing, the Court will consider them. The Court will listen to people who have made a prior written request to speak at the hearing. The Court will also decide whether to award Class Counsel the amount they are requesting for attorneys' fees and expenses. After the hearing, the Court will decide whether to approve the Settlement.

## OBTAINING ADDITIONAL INFORMATION

### 21. Are there more details about the settlement?

This Notice is just a summary, and you are entitled, if you wish, to read the entire Settlement Agreement. The Settlement Agreement and some other documents filed in this lawsuit can be found online at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com).

### 22. How do I get more information?

You can call the Settlement Administrator at 1-833-380-5566. You can also visit the website at [www.SavageAutoLoss.com](http://www.SavageAutoLoss.com), where you will find answers to some common questions.

Please **do not** contact the Court or Clerk of Court with any questions regarding this case.