

## **Notice of Class Action Settlement**

**You may be a class member in a class action against State Auto Mutual Insurance Company (“State Auto”).** The Parties have agreed to settle the case. The case is *Andrews v. State Auto Mut. Ins. Co.*, Case No. 21-cv-05867, United States District Court for the Southern District of Ohio.

**Why am I getting this Notice?** You have been identified as a Settlement Class Member from State Auto’s claims data because you were a policyholder insured by State Auto and submitted a physical damage claim with respect to a covered vehicle that resulted in a total loss claim payment, for Ohio, from December 21, 2013 through September 1, 2022, or for Illinois and Missouri, from December 21, 2011 through September 1, 2022.

**What is this lawsuit about?** The Settlement resolves a lawsuit claiming that State Auto breached its auto insurance policies by improperly failing to pay Vehicle Sales Tax to insureds who submitted Ohio, Illinois or Missouri first-party total loss auto claims. Settlement Terms. State Auto will pay unpaid Vehicle Sales Tax to eligible Settlement Class Members who submit a claim. The payment is the full amount sought in the case. State Auto also will not contest an application for payment of attorneys’ fees of up to \$900,000, and \$5,000 as a service award to the Class Representative. These payments will not reduce the amount of money available to Settlement Class Members.

**How do I receive payment?** To receive a payment, you must complete and mail the attached Claim Form (no stamp needed—return postage has been prepaid) or submit a Claim Form online at [AndrewsSettlement.com](https://AndrewsSettlement.com). You also may make a claim online by visiting [AndrewsSettlement.com](https://AndrewsSettlement.com), clicking “Make a Claim” and entering the Claim ID Number on the attached claim form. Claim forms must be postmarked or submitted online by November 6, 2023.

**Do I have any other options?** Unless you submit a Claim Form, you will not be eligible to get a Settlement payment and your rights will be affected. If you don’t want to be legally bound by the Settlement, pursuant to which you will be giving a release of any claims asserted in the lawsuit, you must exclude yourself from it by September 5, 2023. Unless you exclude yourself, you won’t be able to sue or continue to sue State Auto for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (*i.e.*, don’t exclude yourself), you may object to it or ask for permission for you or your own lawyer to appear and speak at the hearing—at your own cost—but you don’t have to. Objections and requests to appear, which must comply with the procedures for such submissions, are due by September 5, 2023. Objections and requests to appear must include the following information: (a) the name of this Action; (b) your full name, address, and telephone number; (c) all grounds for the objection, accompanied by any legal support for the objection known to you or your counsel; (d) the number of times you have objected to a class action settlement within the five years preceding the date that you file the objection, including the case name and number and jurisdiction of the court for such objections (if any); (e) the identity of your counsel (if any), including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement or fee application; (f) the identity of all counsel (if any) representing you who will appear at the Final Approval Hearing; (g) a list of all persons who will be called to testify at the Final Approval Hearing in support of the objection; (h) a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; and (i) your signature (an attorney’s signature is not sufficient). More details and the full terms of the Settlement are available by visiting [AndrewsSettlement.com](https://AndrewsSettlement.com) or calling toll-free 888-512-3417.