

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

**DO NOT DISCARD THIS NOTICE,
THIS SETTLEMENT AFFECTS YOUR LEGAL RIGHTS**

You have received this Letter because you had an auto insurance policy in Pennsylvania issued by Travelers Insurance Company or an affiliate and received 1-30 days of rental coverage after sustaining a total loss to your vehicle after January 16, 2011 and before May 28, 2021, so you may be able to get a payment from this Class Action Settlement.¹

Therefore, you may be able to get a payment from this class action Settlement.

- The United States District Court for the Eastern District of Pennsylvania authorized this Notice. This is not a solicitation from a lawyer. The Court in charge of the case is the United States District Court for the Eastern District of Pennsylvania, and the case is known as *Stechert v. The Travelers Home and Marine Ins. Co., et al.*, Case No. 17-CV-784.

Your legal rights and options in this Settlement:	
Submit a Claim Form	This is the only way to get a payment in this Settlement. The Claim Form is enclosed with this Notice. Travelers' records indicate you would be entitled to a single payment in the amount of \$30.00, \$75.00, \$200.00 or \$300.00 as further explained in Section 7 below. If the Settlement is approved, you must submit a Claim Form to receive a payment in connection with this Settlement.
Comment (including Objections)	Write to the Court about what you think about the Settlement.
Go to the hearing	If you would like, you may ask to speak in Court about the fairness of the Settlement. You do not need to do this to receive a payment under the Settlement.
Do nothing	You will get no payment if you do not submit a Claim Form and you will still be bound by the terms of the Settlement.
Ask to be excluded	Get out of this Settlement. Get no benefits from it. Keep your right to sue for the claims alleged in this class action.

¹ This Settlement involves Travelers Insurance Company and its affiliates: The Travelers Home and Marine Insurance Company; The Travelers Companies, Inc.; Travelers Property and Casualty Company; and Travelers Indemnity Company, and additional settling parties American Equity Specialty Insurance Company; Discover Property & Casualty Insurance Company; Farmington Casualty Company; Fidelity and Guaranty Insurance Company; Fidelity and Guaranty Insurance Underwriters, Inc.; Northland Casualty Company; Northland Insurance Company; St. Paul Fire and Marine Insurance Company; St. Paul Guardian Insurance Company; St. Paul Mercury Insurance Company; St. Paul Protective Insurance Company; The Automobile Insurance Company of Hartford, Connecticut; The Charter Oak Fire Insurance Company; The Phoenix Insurance Company; The Standard Fire Insurance Company; The Travelers Casualty Company; The Travelers Indemnity Company of America; The Travelers Indemnity Company of Connecticut; Travco Insurance Company; Travelers Casualty and Surety Company; Travelers Casualty and Surety Company of America; Travelers Casualty Company of Connecticut; Travelers Casualty Insurance Company of America; Travelers Commercial Casualty Company; Travelers Commercial Insurance Company; Travelers Constitution State Insurance Company; Travelers Personal Insurance Company; Travelers Personal Security Insurance Company; Travelers Property Casualty Company of America; Travelers Property Casualty Insurance Company, United States Fidelity and Guaranty Company; Consumers County Mutual; Fidelity and Guaranty Insurance Underwriters, Inc., and First Floridian Auto and Home Insurance Company.

**QUESTIONS? CALL 1-855-866-8960 TOLL FREE, OR VISIT
WWW.STECHERTCLASSSETTLEMENT.COM**

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1. Why did I get this Letter?

- You have received this letter (called a “Notice”), and the enclosed Claim Form, because Travelers’ records show that you or a vehicle you insured with Travelers or an affiliate was involved in a loss covered under an insurance policy issued in Pennsylvania. The date of the loss was between January 16, 2011 and May 27, 2021 and Travelers provided rental vehicle benefits for a period of 1 to 30 days. These rental vehicle benefits are referred to as rental reimbursement, extended transportation expense, or ETE benefits.

2. Which companies are part of the settlement?

- This Settlement involves Travelers Insurance Company and its affiliates: THE TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE TRAVELERS COMPANIES, INC., TRAVELERS PROPERTY AND CASUALTY COMPANY, and TRAVELERS INDEMNITY COMPANY, and additional Settling Parties AMERICAN EQUITY SPECIALTY INSURANCE COMPANY, DISCOVER PROPERTY & CASUALTY INSURANCE COMPANY, FARMINGTON CASUALTY COMPANY, FIDELITY AND GUARANTY INSURANCE COMPANY, FIDELITY AND GUARANTY INSURANCE UNDERWRITERS, INC., NORTHLAND CASUALTY COMPANY, NORTHLAND INSURANCE COMPANY, ST. PAUL FIRE AND MARINE INSURANCE COMPANY, ST. PAUL GUARDIAN INSURANCE COMPANY, ST. PAUL MERCURY INSURANCE COMPANY, ST. PAUL PROTECTIVE INSURANCE COMPANY, THE AUTOMOBILE INSURANCE COMPANY OF HARTFORD, CONNECTICUT, THE CHARTER OAK FIRE INSURANCE COMPANY, THE PHOENIX INSURANCE COMPANY, THE STANDARD FIRE INSURANCE COMPANY, THE TRAVELERS CASUALTY COMPANY, THE TRAVELERS INDEMNITY COMPANY OF AMERICA, THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT, TRAVCO INSURANCE COMPANY, TRAVELERS CASUALTY AND SURETY COMPANY, TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA, TRAVELERS CASUALTY COMPANY OF CONNECTICUT, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, TRAVELERS COMMERCIAL CASUALTY COMPANY, TRAVELERS COMMERCIAL INSURANCE COMPANY, TRAVELERS CONSTITUTION STATE INSURANCE COMPANY, TRAVELERS PERSONAL INSURANCE COMPANY, TRAVELERS PERSONAL SECURITY INSURANCE COMPANY, TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA, TRAVELERS PROPERTY CASUALTY INSURANCE COMPANY, UNITED STATES FIDELITY AND GUARANTY COMPANY, CONSUMERS COUNTY MUTUAL, FIDELITY AND GUARANTY INSURANCE UNDERWRITERS INC., and FIRST FLORIDIAN AUTO AND HOME INSURANCE COMPANY (the “Settling Defendants”).

3. What is this lawsuit about?

In the lawsuit, Plaintiffs claim generally, that, in breach of the Policies, Defendants improperly limited the amount of time rental benefits, known as ETE coverage, to a period of time less than thirty (30) days and failed to pay the Plaintiffs and Settlement Class Members the ETE benefits to which they were entitled. The Settling Defendants contend that they did nothing wrong and contend that they paid the full and appropriate amounts for ETE coverage.

4. Why is this a class action?

In a class action, one or more people called Class Representatives, sue on behalf of people who have similar claims. All of these people are part of a “Class.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class. Judge Karen S. Marston of the United States District Court for the Eastern District of Pennsylvania is presiding over this class action.

5. Why is there a Settlement?

After this matter was filed, both sides agreed to a Settlement, which, if approved, brings the litigation to an end. That way, Plaintiffs and the Settling Defendants avoid the cost, delay, and uncertainty of moving forward in litigation to trial and possible appeals, and the Class Members may get payments. The Class Representatives and their attorneys think the Settlement is best for the Class Members.

You may be eligible to receive money from this Settlement, if you are a Class Member and you submit a valid claim form.

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WWW.STECHERTCLASSSETTLEMENT.COM**

In addition, the Settling Defendants have agreed to change certain of their auto rental claim practices at issue in this case, as detailed in the Settlement which may be accessed at www.StechertClassSettlement.com.

6. How do I know if I am part of the Settlement?

- You are a member of the Class if you are a Pennsylvania first party total loss vehicle claimant under private passenger auto policies issued by one of the Settling Defendants in Pennsylvania with a date of loss from January 16, 2011 to May 27, 2021, who were paid for 1-30 days under auto rental reimbursement extended transportation expenses coverage.
- You are receiving this Letter because Travelers' records indicate you would be a member of the Class. You need to fill out the Claim Form in order to receive payment.

7. How much might my payment be?

Each Class Member who submits a valid claim form will receive a single payment ranging from \$30-300, depending on the number of days Settling Defendants paid ETE to the claimant. Payments will be determined as follows, based upon the business records of the Settling Defendants.

<i>Category</i>	<i>Number of Rental Days Already Paid</i>	<i>Distribution Amount per Class Member</i>
I	1-8	\$300.00
II	9-15	\$200.00
III	16-25	\$75.00
IV	26-30	\$30.00

Not everyone who receives this Notice will be eligible for payment. You can only receive your share of the Settlement if you submit a Valid Claim Form by March 25, 2022.

8. How can I receive a payment?

To qualify for payment, you must be an eligible Class Member (see Section 6, above) and submit a valid Claim Form. The Claim Form is enclosed with this Notice. Read the instructions carefully and, if you wish to make a claim, fill out the form, sign it, and submit it by mail postmarked by March 25, 2022 or submit it online by that date.

You can submit the Claim Form by regular mail to STECHERT v. THE TRAVELERS HOME AND MARINE INS. CO., P.O. Box 6546, Portland, OR 97228-6546, or by email to claims@StechertClassSettlement.com. You may also fill out and submit the Claim Form online at www.StechertClassSettlement.com.

9. When would I get my payment?

The Court will hold a hearing on April 19, 2022, to decide whether to approve the Settlement. If the Court approves the Settlement, and there are no appeals, we estimate that checks will be mailed around June 23, 2022. You will get your payment after all appeals have been concluded and the Settlement is approved with no further appeals possible.

We will provide regular updates of the status of the Settlement to all people who submit Claim Forms at www.StechertClassSettlement.com. Please be patient.

10. What am I giving up if I participate in the Settlement?

Unless you exclude yourself, you can't sue, continue to sue, or be part of any other lawsuit against the Settling Defendants about the legal issues in *this* case. It also means that all of the Court's orders will apply to you and legally bind you. If you do not exclude yourself from the Class, you agree to "release and discharge" Settling Defendants as described in Paragraphs 31, 32, 33, 39, 79, and 80 of the Stipulation of Settlement.

This Settlement involves ETE (auto rental) benefits only and does not affect in any way other insurance benefits such as property damage or personal injury claims.

A complete copy of the Stipulation of Settlement can be obtained at www.StechertClassSettlement.com. The Stipulation of Settlement specifically describes the Released Claims in full. Talk to Class Counsel (see section on “The Lawyers Representing You”) or your own lawyer if you have questions about the Released Claims or what they mean.

11. Do I have a lawyer in this case?

The Court has decided that the attorneys bringing this suit are qualified to represent you and all Class Members. Together these lawyers are called “Class Counsel.” Class Counsel appointed by the Court can be reached at:

Richard M. Ochroch, Esquire
Brett N. Benton, Esquire
Andrew R. Ochroch, Esquire
Richard M. Ochroch & Associates, P.C.
318 S. 16th Street
Philadelphia, PA 19102
rochroch@ochroch-law.com

Marc P. Weingarten, Esquire
James Barry, Esquire
Locks Law Firm
601 Market Street, Suite 720 East
170 S. Independence Mall West
Philadelphia, PA 19106
mweingarten@lockslaw.com

Your lawyers’ fees and costs will be determined by the Court and will be paid by the Settling Defendants separate and apart from your individual recovery. You will not be charged for these lawyers’ work in securing the Settlement benefits for you and the other Class Members. You owe nothing if you participate in the Settlement. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. How will the lawyers be paid?

Class Counsel will ask the Court for an award of their attorneys’ fees and expenses that does not exceed \$1,210,000.00, to be paid separate and apart from the Settlement funds for class members, as well as a payment of \$20,000.00 each to the Class Representatives, Kyle Stechert and Marie Stechert. The Court may award less than these amounts. Defendants will separately pay the costs to administer the settlement.

13. What do I do to be excluded?

If you exclude yourself from the Class by “opting out” you won’t get any money or benefits from this Settlement. However, you will retain any right you currently have to make your own claim against the Settling Defendants.

To ask to be excluded, you must send a signed letter, stating that you want to be excluded from STECHERT v. THE TRAVELERS HOME AND MARINE INS. CO. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by March 25, 2022, to: STECHERT v. THE TRAVELERS HOME AND MARINE INS. CO., P.O. Box 6546, Portland, OR, 97228-6546.

14. If I don’t exclude myself, can I sue the Settling Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Settling Defendants for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from *this* Class to continue your own lawsuit if it involves claims that are being released through this Settlement.

Remember, the exclusion deadline is **March 25, 2022**.

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WWW.STECHERTCLASSSETTLEMENT.COM**

15. If I exclude myself, can I get a payment from this settlement?

No. If you exclude yourself, you are not eligible for a payment under the Settlement. But you may sue, continue to sue, or be part of a different lawsuit against Settling Defendants.

16. If I want to, how Can I tell the Court that I like or don't like the Settlement?

If you're a Class Member, and you do not exclude yourself, you can – but need not - comment on or object to the Settlement. You can give reasons why you think the Court should or should not approve it. The Court will consider your views. To be effective, a notice of intent to object to the Settlement must: (a) Contain a heading that includes the name of the case and case number; (b) Provide the name, address, telephone number and signature of the Class Member filing the objection; (c) Be filed with the Clerk of the Court no later than March 25, 2022; (d) Be served on Class Counsel and counsel for the Defendants at the addresses below by first-class mail, postmarked no later than March 25, 2022, which will be held as set forth in Section 17; (e) Contain the name, address, bar number and telephone number of the objecting Class Member's counsel, if represented by an attorney. If you are represented by an attorney, you must comply with all applicable laws and rules for filing pleadings and documents in the Court; and state whether you intend to appear at the Final Settlement Hearing, either in person or through counsel. In addition, if you or your attorney request permission to speak at the Final Settlement Hearing, then your notice of intent to object must contain a detailed statement of the specific legal and factual basis for each and every objection; and a detailed description of any and all evidence you may offer at the Final Settlement Hearing, including photocopies of any and all exhibits which you may introduce at the Final Settlement Hearing.

Class Counsel: Richard M. Ochroch, Esquire Richard M. Ochroch & Associates, P.C. 318 S. 16 th Street Philadelphia, PA 19102	Counsel for Settling Defendants: Mark L. Hanover Dentons US LLP 233 South Wacker Drive Suite 5900 Chicago, IL 60606-6361
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Any comments or objections which do not comply with the above or are not timely served on both counsels listed above will not be considered by the Court.

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

The Court will hold a Final Settlement Hearing at 10:00 A.M. on April 19, 2022 at the United States District Court for the Eastern District of Pennsylvania, United States Courthouse, 601 Market Street, Philadelphia, PA 19106. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will, if the requisite notice of intent to appear and speak is filed, listen to anyone at the hearing who asks to speak, and if objections were timely served, will consider them. The Court will also decide how much to pay Class Counsel and the Class Representatives. The Final Settlement Hearing may be postponed without further notice to the Class.

18. Do I have to come to the hearing?

No. Counsel will answer questions the Judge may have. But you are welcome to come at your own expense. If you send a comment (including an objection), you don't have to come to Court to talk about it. As long as you mail it on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

19. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Settlement Hearing. To do so, you must send a letter to both lawyers listed in Section 16, above, saying that it is your "Notice of Intention to Appear at the Final Settlement Hearing in *Stechert v. The Travelers Home and Marine Ins. Co.*" You must include your name, address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked by March 25, 2022. You cannot speak at the hearing if you previously opted out of the Class, because the case no longer affects you.

20. What happens if I do nothing at all?

If you do nothing, you will get no money from this Settlement. **To receive a payment you must submit a qualifying claim form by March 25, 2022.**

Getting More Information

21. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in the Stipulation of Settlement. You can view and print a copy of the Stipulation of Settlement and other information about the lawsuit by visiting www.StechertClassSettlement.com, where you will find answers to common questions about the Settlement, and other information to help you determine whether you are a Class Member and whether you are eligible for a payment. The website will also have instructions for filling out, and submitting, your Claim Form online or sending it in by mail. You may also call the following toll free number for more information: 1-855-866-8960.

Please do not call the Court, the Court clerk's office, or The Settling Defendants or their lawyers to inquire about this Settlement. They will be unable to help you.

By order of the United States District Court for the Eastern District of Pennsylvania.

Dated: November 10, 2021

/s/ Judge Karen S. Marston
United States District Court Judge