

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 18-cv-01897-DDD-SKC

PHT Holding I LLC, on behalf of itself and all
others similarly situated,

Plaintiff,

v.

SECURITY LIFE OF DENVER INSURANCE
COMPANY,

Defendant.

**DECLARATION OF GINA INTREPIDO-BOWDEN REGARDING SETTLEMENT
ADMINISTRATION**

I, Gina M. Intrepido-Bowden, hereby declare as follows:

INTRODUCTION

1. I am a Vice President at JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and Counsel for the Plaintiff and Defendant (“Counsel”), and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator in the above-captioned matter (“Action”) for the purposes of administering the Joint Stipulation and Settlement Agreement (“Settlement Agreement”) as ordered by the Court in its Order Preliminarily Approving Class Action Settlement (“Order”) (Dkt. 225), dated April 18, 2023. I previously submitted the

Declaration Regarding Proposed Settlement Notice Program (Dkt. 224-7). I am submitting this Declaration to provide an update on the implementation of the Settlement Notice Plan.

CLASS DATA RECEIVED

3. On May 5, 2023, JND received a spreadsheet containing the names, mailing addresses, and policy numbers of individuals identified as potential Class Members from Defendant Security Life of Denver's own files. The file contained 353 total records.

4. Prior to mailing notices, JND updated the Class Member contact information using data from the National Change of Address ("NCOA") database.¹ The Class Member data was promptly loaded into a database established for this Action.

NOTICE MAILING

5. On May 18, 2023, JND mailed the Court-approved Class Notice via U.S Postal Service regular mail to the 353 records identified as potential Class Members. A representative sample of the short-form Class Notice that was mailed is attached hereto as **Exhibit A**.

6. As of July 6, 2023, of the 353 Class Notices mailed, 21 Class Notices were returned to JND as undeliverable. For the undeliverable Class Notices, JND conducted advanced address searches and received updated address information for seven (7) Class Members, and JND re-mailed the Class Notices to the updated addresses accordingly.

7. As of July 6, 2023, of the 353 Class Notices mailed, 339 or 96% were successfully delivered and 14 Class Notices or approximately 4% were deemed undeliverable.

SETTLEMENT WEBSITE

¹ The NCOA database is the official United States Postal Service ("USPS") technology product which makes changes of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream.

8. On May 18, 2023, JND updated the dedicated website for the Action (www.SecurityLifeofDenverCOI.com) to include information about the proposed Settlement. The website hosts copies of important case documents (including, but not limited to, downloadable copies of the Class Action Complaint and Jury Demand, Order Granting in Part and Denying in Part Security Life's Motion for Summary Judgment and Granting in Part Plaintiff's Renewed Motion for Class Certification, Joint Stipulation and Settlement Agreement, Preliminary Approval Order, and the Long Form Notice), answers to frequently asked questions, and contact information for the Settlement Administrator. A copy of the Long Form Notice that was uploaded to the website on May 18, 2023 is attached hereto as **Exhibit B**.

9. Since updating the website on May 18, 2023, as of July 6, 2023, the Settlement Website has tracked 422 unique users who registered 964 page views.

10. On June 16, 2023, Class Counsel filed its Motion for Attorneys' Fees and Reimbursement of Litigation Expenses. JND updated the website to include a downloadable copy of Class Counsel's Motion for Attorneys' Fees and Reimbursement of Litigation Expenses that same day.

TOLL-FREE TELEPHONE LINE

11. On May 18, 2023, JND updated the Interactive Voice Response ("IVR") recordings on the dedicated toll-free telephone number for the Action (1-833-667-1230) to provide information about the Settlement. The toll-free number is accessible 24 hours a day, 7 days a week.

12. Since updating the IVR recordings on May 18, 2023, as of July 6, 2023, JND has received 40 calls to the toll-free telephone line.

OBJECTIONS

13. The Class Notice informed recipients that Class Members may object to the Settlement if they do not agree with the terms of the proposed Settlement. In order to do so, Class Members were required to file a written objection with the Court and serve copies to Class Counsel and Counsel for Defendant. The deadline to object to the Settlement was July 3, 2023.

14. As of July 13, 2023, JND has not received any objections to the Settlement or to Class Counsel's fee request.

15. If the Court grants final approval to the Settlement and SLD thereafter funds the Settlement Fund Account, JND will mail checks to Class Members according to the Plan of Allocation within 30 days of SLD funding the Settlement Fund Account.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 17, 2023, at Stone Harbor, NJ.



Gina Intrepido-Bowden

EXHIBIT A

COURT AUTHORIZED
LEGAL NOTICE

**If you own or owned a
Strategic Accumulator
Universal Life Policy issued
by Security Life of Denver
that was subject to a COI
rate increase announced
in September 2015,
you may be affected by
a class action settlement**

www.SecurityLifeofDenverCOI.com

Security Life COI Life Insurance Settlement
c/o JND Legal Administration
P.O. Box 91225
Seattle, WA 98111

«Barcode»

Postal Service: Please do not mark barcode

«Full_Name»

«CF_CARE_OF_NAME»

«CF_ADDRESS_1»

«CF_ADDRESS_2»

«CF_CITY», «CF_STATE» «CF_ZIP»

«CF_COUNTRY»

A proposed settlement has been reached in a class action lawsuit called *PHT Holding I LLC v. Security Life of Denver Insurance Co.*, Case No. 1:18-cv-01897-DDD-SKC (D. Colo.) (the “Settlement”). Records indicate you may be affected. This Notice summarizes your rights and options. More details are available at www.SecurityLifeofDenverCOI.com.

What is this about? The lawsuit alleges that Defendant Security Life of Denver Insurance Company (“Security Life”) breached its contracts with certain Strategic Accumulator Universal Life (“SAUL”) policy owners. In September 2015, Security Life announced that certain SAUL insurance policies issued between 2003 and 2006 would be subject to a cost of insurance (“COI”) rate increase. Plaintiff asserts the COI rate increase violated the terms of the policy owners’ contracts, and resulted in damages for Plaintiff and members of the Class. Security Life denies Plaintiff’s claims and asserts multiple defenses. The Court has not decided who is right or wrong. Instead, both sides have agreed to a Settlement to avoid the risks, costs, and delays of further litigation.

Who is affected? The Class consists of all owners of SAUL policies subjected to Security Life’s COI rate scale increase announced in September 2015. Excluded from the Class are policy owners who previously requested exclusion from the litigation; owners of SAUL policies subjected to the COI rate increase whose policies were issued in Alaska, Arkansas, New Mexico, Virginia, and Washington; and Security Life, its officers and directors, members of their immediate families, and their heirs, successors, or assigns.

What does the Settlement provide? A Settlement Fund of \$30 million will be established. After payments for settlement administration, attorneys’ fees (not to exceed 33 1/3% or \$10,000,000 of the Settlement Fund) and litigation expenses, and Plaintiff’s Incentive Award (up to \$35,000); the remaining amount will be distributed to Class Members in proportion to their share of the overall COI overcharges collected from the Class through December 30, 2022, with a minimum cash distribution amount of \$100.00 per policy.

No portion of the Settlement Fund will be returned to Security Life. In addition, Security Life agrees not to increase COI rate scales on policies covered by the Settlement until March 31, 2028. Security Life also agrees that it will not take certain legal action or assert certain legal defenses challenging death claims for any Class Member as outlined in the Settlement Agreement available at www.SecurityLifeofDenverCOI.com.

What are my options? You can do nothing or object to the Settlement.

Do nothing. You will be part of the Class and receive certain benefits from the Settlement. You will automatically receive 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 Security Life for the claims in this case.

Object. You may object or tell the Court what you do not like about the 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. Objections must be **filed and served by July 3, 2023**.

For more details about your rights and options and how to object, go to www.SecurityLifeofDenverCOI.com.

What happens next? The Court will hold a Fairness Hearing on September 13, 2023 at 2:30 MT at the United States District Court for the District of Colorado, Alfred A. Arraj United States Courthouse, 901 19th Street, Denver, CO, 80294, to consider whether the Settlement is fair, reasonable, and adequate; and how much to pay and reimburse Class Counsel and Plaintiff. The Court has appointed Susman Godfrey L.L.P. as Class Counsel. You or your attorney may ask to speak at the hearing at your own expense, but you do not have to.

How can I get more information? Go to www.SecurityLifeofDenverCOI.com, call toll-free 1-833-667-1230, or write to Security Life COI Life Insurance Settlement, c/o JND Legal Administration, P.O. Box 91225, Seattle, WA 98111.

Carefully separate this Address Change Form at the perforation

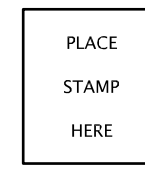
Name: _____

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.



Security Life COI Life Insurance Settlement
c/o JND Legal Administration
P.O. Box 91225
Seattle, WA 98111

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

NOTICE OF CLASS ACTION SETTLEMENT

If you own or owned a Strategic Accumulator Universal Life Policy issued by Security Life of Denver that was subject to a COI rate increase announced in September 2015, you may be affected by a class action settlement

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 *PHT Holding I LLC v. Security Life of Denver Insurance Co.*, Case No. 1:18-cv-01897-DDD-SKC (D. Colo.) (the “Settlement”).
- Plaintiff alleges that Defendant Security Life of Denver Insurance Company (“Security Life”) breached its contracts with Strategic Accumulator Universal Life (“SAUL”) policy owners. In September 2015, Security Life announced that SAUL insurance policies would be subject to a cost of insurance (“COI”) rate scale increase. Plaintiff asserts the COI rate increase violated the terms of the policy holders’ contracts, and that Plaintiff and members of the Class have been damaged as a result. Security Life denies Plaintiff’s claims and asserts multiple defenses. The Court has not decided who is right or wrong. Instead, both sides have agreed to the Settlement to avoid risks, costs, and delays of further litigation.
- The case is currently pending before Judge Daniel D. Domenico of the United States District Court for the District of Colorado (the “Court”). If the Court approves the Settlement, Class Members will be eligible to receive payment from a cash Settlement Fund of \$30 million, as further detailed in Question 10.
- In addition, Security Life agrees that the COI rate scales on SAUL policies will not be increased until March 31, 2028. Security Life also agrees that it will not take certain legal action or assert certain legal defenses challenging death claims for any Class Member as outlined in the Settlement Agreement available at www.SecurityLifeofDenverCOI.com.
- You are a Class Member if you own or owned a SAUL policy subjected to Security Life’s COI rate increase announced in September 2015. Excluded from the Class are those who have previously opted out of the certified class; owners whose policies were issued in Alaska, Arkansas, New Mexico, Virginia, and Washington; and Security Life, its officers and directors, members of their immediate families, and their heirs, successors, or assigns. Your legal rights are affected whether or not you act. ***Please read this Notice carefully.***

YOUR LEGAL RIGHTS AND OPTIONS		
Do Nothing	<ul style="list-style-type: none">• Get certain benefits from the Settlement — Automatically receive a payment in the mail if you are entitled to one• Be bound by the Settlement• Give up your right to sue or continue to sue Security Life for the claims in this case	
Object	<ul style="list-style-type: none">• Tell the Court what you do not like about the 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.	Filed and served by July 3, 2023

- 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.SecurityLifeofDenverCOI.com regularly for updates and further details.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

WHAT THIS NOTICE CONTAINS

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BASIC INFORMATION

1. Why was this Notice issued?

You have a right to know about a proposed Settlement and your rights and options before the Court decides whether to approve the Settlement.

Judge Daniel D. Domenico of the United States District Court for the District of Colorado is in charge of this case. The case is called *PHT Holding I LLC v. Security Life of Denver Insurance Co.*, Case No. 1:18-cv-01897-DDD-SKC (D. Colo.). PHT Holding I LLC owns two SAUL policies that were subjected to the COI rate increase at issue in the case and is the Plaintiff and Court-appointed class representative in this case. The company it sued, Security Life, is called the Defendant.

2. What is this lawsuit about?

The class action lawsuit alleges that Security Life breached its contracts with certain SAUL policy owners when in September 2015, Security Life announced that SAUL insurance policies would be subject to a cost of insurance (“COI”) rate scale increase. Plaintiff asserts the COI rate increase violated the terms of the policy holders’ contracts, and that Plaintiff and members of the Class have been damaged as a result. Specifically, Plaintiff alleged that Security Life breached the policy provision which states “Any change in rates will apply to all individuals of the same premium class and whose policies have been in effect for the same length of time.” Security Life denies Plaintiff’s claims and asserts multiple defenses, including that the challenged action is permitted by the contract terms, lawful, justified, and has not harmed Plaintiff or caused any damages. The Court has not decided who is right or wrong. Instead, both sides have agreed to the Settlement to avoid the risks, costs, and delays of further litigation, so that people affected will get a chance to receive compensation.

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

The marketing name of the policies subject to the COI rate increase in September 2015 is **Strategic Accumulator Universal Life** or **Strategic Accumulator UL**. The SAUL policies that were subject to the COI rates scale increase were issued between 2003 and March 2006.

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, PHT Holding I LLC, represents other eligible SAUL policy owners and together they are called the “Class” or “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?

In the Court's Order certifying the Class, the Court decided that the settlement of the breach of contract claim against Security Life in this lawsuit can proceed as a class action because, at that point of the lawsuit, it met the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal court. The Court found that:

- There are numerous Class Members whose interests will be affected by this lawsuit;
- There are legal questions and facts that are common to each of them;
- The Class Representative's claims are typical of the claims of the rest of the Class;
- The Class Representative and the lawyers representing the Class will fairly and adequately represent the interests of the Class;
- A class action would be a fair, efficient and superior way to resolve this lawsuit;
- The common legal questions and facts predominate over questions that affect only individual Class Members; and
- The Class is ascertainable because it is defined by identifiable objective criteria.

In certifying the Class, the Court appointed Susman Godfrey LLP as Class Counsel. For more information, visit the Important Documents page at www.SecurityLifeofDenverCOI.com.

6. Why is there a Settlement?

Security Life denies any and all liability or wrongdoing of any sort with regard to the 2015 COI rate increase. Trial was scheduled to start on February 13, 2023. Two days before trial, the parties reached a settlement in principle, which was subsequently memorialized in the Settlement Agreement, in order to avoid the risks, costs, and delays of further litigation. The Court has not decided in favor of Plaintiff or Defendant. Plaintiff and Class Counsel think the Settlement is in the best interests of the Class and is fair, reasonable, and adequate.

THE CLASS

7. Am I part of the Class?

The Class consists of all owners of SAUL policies subjected to Security Life's COI rate increase announced in September 2015.

8. Are there exceptions to being included?

Yes. Excluded from the Class are owners of SAUL policies subjected to the COI rate increase whose policies were issued in Alaska, Arkansas, New Mexico, Virginia, and Washington, and Security Life, its officers and directors, members of their immediate families, and their heirs, successors, or assigns.

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

If you are still not sure whether you are a Class Member, please visit www.SecurityLifeofDenverCOI.com, call the Settlement Administrator toll-free at 1-833-667-1230, or write to: Security Life COI Life Insurance Settlement, c/o JND Legal Administration, P.O. Box 91225, Seattle, WA 98111.

WHAT CLASS MEMBERS GET

10. What does the Settlement provide?

A Settlement Fund of \$30 million will be established for Class Members. After payment of the cost to administer the Settlement Fund as well as attorneys' fees and expenses and the payments to the Class Representative (*see* Question 14 below), the Settlement Administrator will distribute the remaining amounts to Class Members in proportion to their share of the overall COI overcharges collected from the Class through December 30, 2022, with a minimum cash payment to each Class Member of \$100.00. No portion of the Settlement Fund will be returned to Security Life.

Security Life has also agreed not to:

- Raise COI rate scales on policies covered by the Settlement for a period of five years from the date of the Settlement Agreement. In other words, Security Life is prohibited from imposing another COI rate scale increase on the policies in the class until March 31, 2028, at the earliest.
- Cancel, void, rescind, or deny a death claim submitted under the Class Members' policies or contest the validity of a policy based on:
 - An alleged lack of valid insurable interest under any applicable law or equitable principles; or
 - Any misrepresentation allegedly made on or related to the application for, or otherwise made in applying for the policy.

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

If you are a Class Member, you cannot sue, continue to sue, or be part of any other lawsuit against Security Life about the facts that arise from the same factual predicate of the claims released in this Settlement. It also means that all the decisions by the Court will bind you. The Released Claims and Released Parties are defined in the Settlement Agreement. They describe the legal claims that you give up if you stay in the Settlement. The Settlement Agreement is available at www.SecurityLifeofDenverCOI.com.

HOW TO GET A PAYMENT

11. How can I get a payment?

You will automatically receive a payment in the mail if you are entitled to one. No claims need to be filed.

Questions? Call 1-833-667-1230 or visit www.SecurityLifeofDenverCOI.com

12. When will I get my payment?

Payments will be mailed to 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 whether these appeals can be resolved and resolving them can take time. Please be patient.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

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

Steven G. Sklaver
Michael Gervais
SUSMAN GODFREY LLP
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-6029
ssklaver@susmangodfrey.com
mgervais@susmangodfrey.com
Telephone: 310-789-3100

Seth Ard
Ryan Kirkpatrick
Zach Savage
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
sard@susmangodfrey.com
rkirkpatrick@susmangodfrey.com
zsavage@susmangodfrey.com
Telephone: 212-336-8330

14. How will the lawyers be paid?

The Court will determine how much Class Counsel will be paid for fees and expenses. Class Counsel will file a motion seeking an award for attorneys’ fees not to exceed 33 1/3% the Final Settlement Fund (i.e., \$10,000,000.00). In addition to seeking an award for attorneys’ fees, Class Counsel will seek reimbursement for expenses incurred or to be incurred in connection with the Settlement, as well as an Incentive Award up to \$35,000 for Plaintiff for its service as the representative on behalf of the Class, to be paid from the Final Settlement Fund. You will not be responsible for direct payment of any of these fees, expenses, or awards.

15. Should I get my own lawyer?

You do not need to hire your own lawyer to pursue the claims against Security Life because Class Counsel is working on behalf of the 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

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

Any Class Member may object to the fairness, reasonableness, or adequacy of the proposed 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 Counsel for Defendant. The written objection must include:

- Your full name, address, telephone number, and email address (if any);
- The case name (*PHT Holding I LLC v. Security Life of Denver Insurance Co.*);
- The policy number(s);
- A written statement of all grounds for the objection accompanied by any legal support for the objection (if any);
- Copies of any papers, briefs, or other documents upon which the objection is based;
- A list of all persons who will be called to testify in support of the objection (if any);
- A statement of whether you intend to appear at the Fairness Hearing; and
- Your or your counsel’s signature.

If you intend to appear at the Fairness Hearing through counsel, the written objection must also state the identity of all attorneys representing you who will appear at the Fairness Hearing. 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 Counsel for Defendant by **July 3, 2023** at the following addresses:

Clerk of the Court	Counsel for Defendant
Alfred A. Arraj United States Courthouse Room A105 901 19 th Street Denver, CO 80294-3589	Clark C. Johnson Casey L. Hinkle Michael T. Leigh Burt A. (Chuck) Stinson Kaplan Johnson Abate & Bird LLP 710 West Main Street, 4th Floor Louisville, KY 40202 cjohnson@kaplanjohnsonlaw.com chinkle@kaplanjohnsonlaw.com mleigh@kaplanjohnsonlaw.com cstinson@kaplanjohnsonlaw.com
Class Counsel	
Steven G. Sklaver Michael Gervais SUSMAN GODFREY LLP 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067-6029 Seth Ard Ryan Kirkpatrick Zach Savage SUSMAN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023	

THE COURT'S FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on **September 13, 2023** at 2:30 MT at the United States District Court for the District of Colorado, Alfred A. Arraj United States Courthouse, 901 19th Street, Denver, CO, 80294. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider how much to pay and reimburse Class Counsel and any Incentive Award payment to Plaintiff. If there are objections, the Court will consider them at this time. We do not know how long these decisions will take.

18. Do I have to come to the hearing?

No. But you or your own lawyer may attend at your 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.

19. 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 send a letter saying that it is your "Notice of Intent to Appear." Your request must state your name, address, and telephone number, as well as the name, address, and telephone number of the person that will appear on your behalf. Your request must be filed with the Clerk of the Court and served on Class Counsel and Defendant's Counsel no later than **July 3, 2023**. See Question 16 for addresses.

IF YOU DO NOTHING

20. 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. You will be bound by the Settlement, and you will give up your right to sue or continue to sue Security Life for the claims in this case.

GETTING MORE INFORMATION

21. How can I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, available at www.SecurityLifeofDenverCOI.com. You can also call the Settlement Administrator toll-free at 1-833-667-1230, or write to:

Security Life COI Life Insurance Settlement
c/o JND Legal Administration
P.O. Box 91225
Seattle, WA 98111