

**IN THE CIRCUIT COURT OF BARBOUR COUNTY, ALABAMA
(Eufaula Division)**

Walker v. Alfa Mutual Insurance Company,
Case No. 69-CV-2024-900015.00

IMPORTANT NOTICE OF CLASS ACTION SETTLEMENT

**A court authorized this Notice.
This is not a solicitation from a lawyer.
You are not being sued.**

PLEASE READ THIS NOTICE CAREFULLY

A settlement has been reached in the case *Walker v. Alfa Mutual Insurance Company*, Case No. 69-CV-2024-900015.00, entitling members of the Settlement Class, who submit a valid and timely claim form, to unpaid taxes, title and registration transfer fees (“Purchasing Fees”) for Covered Total Loss Claims. This Notice explains: 1) the terms of the Settlement; 2) who is a member of the Settlement Class; 3) how to submit a Claim Form for payment; 4) how to request exclusion from the Settlement; 5) how to object to the Settlement; and 6) how to get more information about the Settlement.

IF YOU ARE A SETTLEMENT CLASS MEMBER, THIS LEGAL PROCEEDING MAY AFFECT YOUR RIGHTS.

HELP IS AVAILABLE TO ASSIST YOUR UNDERSTANDING OF THIS NOTICE.

Call [TOLL-FREE NUMBER] toll free or visit [SETTLEMENT WEBSITE] for more information.

What Is a Class Action?

A class action is a lawsuit in which one or more individuals bring claims on behalf of other persons or entities. These persons or entities are referred to as a class or class members. In a certified class action, the Court resolves certain issues, legal claims, and/or defenses for all class members in a single action, except for those persons or entities who ask in writing to be excluded from the class.

What Is this Class Action About?

Plaintiff alleges that Alfa Mutual Insurance Company breached its contracts (Automobile Insurance Policies) by failing to fully pay Plaintiff and other Alabama insureds who submitted physical damage claims for their vehicles during the Class Period, which resulted in a Total Loss Claim Payment. Specifically, Plaintiff alleges that Alfa Mutual Insurance Company failed to pay full Purchasing Fees following a total loss. ALFA maintains that it complied with the terms of the Automobile Insurance Policies and applicable law and denies that it acted wrongfully or unlawfully and continues to deny all material allegations.

Settlement Terms

As a part of the Settlement, ALFA has agreed to pay Settlement Class Members who were insured by Alfa Mutual Insurance Company or other affiliated ALFA insurers (except for Government Employees Insurance Company) and who submit a valid timely Claim, upon Court approval:

QUESTIONS? CALL [TOLL FREE NUMBER] TOLL-FREE, OR VISIT [SETTLEMENT WEBSITE]

Up to \$24.00 (less any Purchasing Fees included in the original total loss claim payment). Alfa contends that, as part of its normal practice, it has fully paid taxes on all Alabama Covered Total Loss Claim as part of the Total Loss Claim Payment. If, however, it comes to Alfa's attention that a Claimant was not paid taxes as part of the Total Loss Claim Payment, then Alfa will agree to include sales tax to that Claimant as part of their settlement payment.

Class Counsel is seeking Fees and Costs not to exceed \$450,000.00 and a Service Award not to exceed \$10,000.00 to the Class Representative, with all amounts to be approved by the Court. Class Counsel's motion for attorneys' fees, costs and expenses shall be made available at www.XXXX.com

In exchange, Plaintiff and the Settlement Class Members who do not exclude themselves agree to give up any claim they have for payment of fees in relation to their total loss claims. If you are a member of the Settlement Class, you can submit a Claim Form to be eligible to be paid. Alternatively, you may, if you wish, request to be excluded from the Settlement Class, which means you are not eligible for payment, and you maintain your right to sue ALFA individually and separately for payment of Purchasing Fees. You may also object to the terms of the Settlement, if you comply with the requirements set forth below.

How Do I Know if I'm a Member of the Settlement Class?

You may be a member of the Settlement Class if you insured a vehicle for physical damage coverage under an Alabama personal automobile policy issued by Alfa Mutual Insurance Company, submitted a covered first-party physical damage claim during the Class Period that was a total loss, but your Total Loss Settlement from ALFA did not include any or all Purchasing Fees. The Class Period is from March 13, 2018 to [DATE OF PRELIMINARY APPROVAL].

If you already received full Purchasing Fees as part of your Total Loss Claim Payment, you are not part of the Settlement Class. You received this Notice because ALFA's records indicate you had a Total Loss claim and therefore may be a member of the Settlement Class.

If I Am a Class Member, What Are My Options?

If you are a Class Member, you have four options.

Option 1: Submit a Claim for Payment.

You may submit a Claim for payment of unpaid Purchasing Fees. You can submit a claim by signing the Claim Form you receive in the mail, carefully tearing at the perforation, and putting the Claim Form in the mail. You can call [TOLL-FREE NUMBER] or visit [SETTLEMENT WEBSITE] and request that the Settlement Administrator send you a Claim Form (or a blank form that you will need to fill out).

If you submit a Claim Form in the mail, it must be postmarked no later than [CLAIMS DEADLINE]. If the address you submit on your Claim Form changes, you must contact the Settlement Administrator to provide a current address or you may not receive your Settlement Class Member Payment.

You can also submit a claim online at [settlement website] by entering your Claimant ID or valid total loss claim number and unique PIN. Online Claims must be submitted by 11:59pm EST on [Date]. Your Claimant ID and PIN can be found on the postcard and email notices you received.

Option 2. Exclude yourself from the Settlement.

You have the right to not be part of the Settlement by excluding yourself or “opting out” of the Settlement Class. If you wish to exclude yourself, you must do so on or before **[OPT-OUT DEADLINE]** as described below. You do not need to hire your own lawyer to request exclusion from the Settlement Class. If you exclude yourself from the Settlement Class, you give up your right to receive any benefits as part of this Settlement, and you will not be bound by any judgments or orders of the Court, whether favorable or unfavorable. However, you will keep your right to sue ALFA separately in another lawsuit if you choose to pursue one.

To exclude yourself from this lawsuit and/or preserve your right to bring a separate case, you must make a request to be excluded in writing and, with sufficient postage, mail the request to:

Walker Class Action Settlement
c/o [CLAIMS ADMINISTRATOR]
[ADDRESS]
[CITY, STATE ZIP]

A request for exclusion must be postmarked on or before **[OPT-OUT DEADLINE]**.

Your request for exclusion must contain the following:

1. The name of the Action (*Walker v. Alfa Mutual Insurance Company*)
2. Your full name;
3. Your current address;
4. Your phone number;
5. A clear statement that you wish to be excluded from the Settlement Class, such as: “I request exclusion from the Settlement Class”; and
6. Your signature.

The Settlement Administrator will file your request for exclusion with the Court. If you are signing on behalf of a Settlement Class member as a legal representative (such as an estate, trust or incompetent person), please include your full name, contact information, and the basis for your authority. A request for exclusion must be exercised individually and not on behalf of a group.

IF YOU DO NOT EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY THE POSTMARK DEADLINE OF **[OPT-OUT DEADLINE], YOU WILL REMAIN PART OF THE SETTLEMENT CLASS AND WILL BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT AND BY THE TERMS OF THE SETTLEMENT IF IT IS APPROVED BY THE COURT, EVEN IF YOU DO NOT SUBMIT A CLAIM FORM FOR PAYMENT. IF YOU DO NOT WISH TO BE BOUND BY THE DECISIONS OR SETTLEMENT IN THIS CASE, YOU MUST REQUEST EXCLUSION FROM THE CLASS ACTION.**

The Circuit Court is conducting a **FAIRNESS HEARING** on **[HEARING DATE]**, at **[HEARING TIME]**. **EST** in Courtroom [#] of [COURTHOUSE], [COURT ADDRESS] to decide whether to grant final approval of the Proposed Settlement. The date of the **FAIRNESS HEARING** may change without further notice to the class. You should be advised to check the settlement website at [SETTLEMENT WEBSITE], to confirm that the date of the **FAIRNESS HEARING** has not been changed. Be advised that the hearing date may change without further notice to the Settlement Class.

Option 3: Object to the Terms of the Settlement.

The full terms of the Settlement can be found at [SETTLEMENT WEBSITE]. If you think the terms of the Settlement are not fair, reasonable, or adequate to the Settlement Class Members, you may file a Notice of Intent to Object to the terms of the Settlement. If you object to the terms of the Settlement, you cannot request exclusion from the Settlement. If you object to the terms of the Settlement and your objection is overruled, you will be bound by the terms of the Settlement and all rulings and orders from the Court.

To properly object to the terms of the Settlement, you must send, with sufficient postage, a Notice of Intent to Object to the terms of the settlement (described below) to the following:

Walker v. Alfa Mutual Insurance Company
c/o [CLAIMS ADMINISTRATOR]
[ADDRESS]
[CITY, STATE ZIP]

The Notice of Intent to Object to the terms of the settlement must include all of the following information:

1. The name of the case and case number;
2. Your name, address, telephone number, and signature;
3. The specific reasons why you object to the terms of the Proposed Settlement;
4. The name, address, bar number, and telephone number of any attorney who represents you related to your intention to object to the terms of the Settlement;
5. Whether you and/or your attorney intend to appear at the Fairness Hearing and whether you and/or your attorney will request permission to address the Court at the Fairness Hearing.

If you and/or your attorney intend to request permission to address the Court at the Fairness Hearing, your Notice of Intent must also include all of the following information:

1. A statement of the legal and factual basis for each objection;
2. A list of any and all witnesses the Settlement Class Member may seek to call at the Fairness Hearing;
3. A list of any legal authority the Settlement Class Member will present at the Fairness Hearing;
and
4. Identify either your class member number or full name and address when the total loss occurred.

Notices of Intent to object must be postmarked by **[OBJECTION DEADLINE]**. Any Notice of Intent to Object to the settlement that is not postmarked by the deadline set forth above or which does not comport with the requirements listed above may waive the right to be heard at the Fairness Hearing. If you file a Notice of Intent, you waive the right to request exclusion from the Settlement Class and will be bound by any decisions and orders from the Court and by the terms of the Settlement if it is approved by the Court. If you do not want to be bound by the decisions and rulings by the Court, you must file a request for exclusion and not a Notice of Intent to Object to the settlement.

Option 4. Do Nothing Now. Stay in the Case.

You have the right to do nothing. If you do nothing, you will be bound by the terms of the Settlement and will release any claim against ALFA for Purchasing Fees, even if you do not submit a Claim Form for payment. You will not receive a Settlement Payment if you do not submit a Claim Form for payment.

Who Is Representing the Class?

The Court has preliminarily appointed Plaintiff, DEMETRIA WALKER, to be the Class Representative of the Settlement Class. The Court has also preliminarily appointed the following law firms as Class Counsel for the Settlement Class:

IRBY LAW, LLC
2201 Arlington Avenue South
Birmingham, AL 35205

NORMAND PLLC
3165 McCrory Place, Ste. 175
Orlando, FL 32803
Phone: (407) 603-6031

These law firms are experienced in handling class action lawsuits, including actions on behalf of insured policyholders. More information about Class Counsel is available on their websites.

Class Counsel will be seeking attorneys' fees and costs of up to \$450,000.00, with all amounts to be approved by the Court.

Class Counsel will also seek a Service Award for the Class Representative in the amount of \$10,000.00, subject to Court approval. The Service Award is designed to reward the Class Representative for securing the recovery awarded to members of the Settlement Class, and to acknowledge the time spent by the Plaintiff participating in the case and prosecuting the claims for the benefit of the Settlement Class.

What Claim(s) Against ALFA Are Class Members Releasing?

As a part of the Settlement, Settlement Class Members agree not to sue ALFA by asserting any claim for payment or non-payment of fees (including, but not limited to, purchasing, title, registration/handling, plate and other fees) in relation to their total loss claims. Unless you request exclusion from the Settlement Class, you give up the right to individually sue ALFA for unpaid purchasing fees (including, but not limited to, title, registration/handling, taxes, plate and other fees) as part of your Covered Total Loss Claim, even if you do not submit a Claim Form for payment as part of this Settlement. You are not releasing any other claim against ALFA. Full terms of the Released Claims and Released Parties can be found in the proposed Settlement Agreement at _____.com.

How Do I Find Out More About This Lawsuit?

If you have any questions about the settlement or any matter raised in this Notice, please call toll-free at [TOLL-FREE NUMBER] or go to [SETTLEMENT WEBSITE].

This [SETTLEMENT WEBSITE] website provides:

1. A blank Claim Form;
2. The full terms of the Settlement;

3. Information and requirements for submitting a Claim Form, requesting exclusion, or filing an objection to the terms of the Settlement;
4. A copy of the Complaint filed by Plaintiff and
5. Other general information about the class action.

You also may contact Class Counsel, whose contact information is provided above.

If the address you submit on your Claim Form changes, you must contact the Settlement Administrator to provide a current address or you may not receive your Settlement Class Member Payment.

PLEASE DO NOT TELEPHONE OR CONTACT THE COURT, THE CLERK OF THE COURT, OR ALFA OR ALFA'S COUNSEL REGARDING THIS NOTICE.

DATED: [DATE], 2026