

If You Made a Claim with Progressive Security in Louisiana for Total Vehicle Loss, a Class Action Lawsuit May Affect Your Rights

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

- An insured of Progressive Security Insurance Company in the State of Louisiana, Cheryl Slade, alleges Progressive Security paid her and others similarly situated, less for their total loss of vehicles than the amount they were entitled under their insurance policies.
- The Court has allowed the lawsuit to proceed as a class action on behalf of all named Louisiana Progressive Security insureds who received payment for total loss motor vehicles located in the State of Louisiana, under the terms of their collision automobile insurance policy with Progressive Security Insurance Company, utilizing the Mitchell Work Center Total Loss (WCTL) system, from July 1, 2010 to June 24, 2019.
- The Court has not decided whether Progressive Security did anything wrong. There is no money available now and no certainty there will be. However, your legal rights are affected and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement in this case. But you give up any right to sue Progressive Security separately on any claim that is or could have been included in this lawsuit.
EXCLUDE YOURSELF	Get out of this lawsuit. Get no benefits from it. Keep your rights. If you ask to be excluded from the lawsuit and money or benefits are later awarded, you won't share in those. But you keep any right to sue Progressive Security separately on the claims in this lawsuit.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- Claims against Progressive Security must be proven. If money or other benefits are obtained from Progressive Security, you will be notified about how those benefits will be distributed to you.
- Questions? Read this Notice and visit www.SladeTotalLoss.com.

BASIC INFORMATION

1. Why did I get this Notice?

Progressive Security's records show that you received payment for total loss of a motor vehicle located in Louisiana. A Court decided to allow a class action lawsuit to proceed against Progressive Security related to how it calculated the value of the vehicle for which you claimed a total loss. You have legal rights and options that you may exercise before trial. The trial is to decide whether the claims being made against Progressive Security are correct. The case may settle or be dismissed before a trial or on appeal.

Judge Michael Juneau, of the United States District Court for the Western District of Louisiana Lafayette Division currently is overseeing this case. The case is known as *Slade v. Progressive Security Insurance Co.*, Civil Case No. 6:11-cv-2164. The person who sued, Cheryl Slade, is called the "Plaintiff." Progressive Security is called the "Defendant."

2. What is a class action and who is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Cheryl Slade) sue on behalf of other people who have similar claims. Together, those other people are a "Class" or "Class Members." The Class Representative(s) who sued—and all the Class Members like them—are called the Plaintiffs. The company they sued (in this case Progressive Security) is called the Defendant. One Court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

3. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move toward a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that 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.

More information about why the Court is allowing this lawsuit to be a class action is in the Court's Order Certifying the Class, which is available at www.SladeTotalLoss.com.

THE CLAIMS IN THE LAWSUIT

4. What is the complaint about?

This lawsuit is about whether Progressive Security's calculations for total loss vehicles in Louisiana resulted in insureds being paid less for their vehicles than the amount which they were entitled to under their insurance policies. You can read Plaintiff's Class Action Complaint at www.SladeTotalLoss.com. Plaintiff alleges that Progressive Security uses the Mitchell Work Center Total Loss ("WCTL") system, and that the WCTL method of valuation results in insureds being paid less than they are entitled for their total loss vehicle claims. Plaintiff alleges that this conduct by Progressive Security violates the law. You can read Plaintiff's Class Action Complaint at www.SladeTotalLoss.com.

5. How Does Progressive Security Answer?

Progressive Security denies any wrongdoing. Progressive Security claims that it has fully complied with the terms of the Policy and Louisiana law, and Progressive Security argues that the Policy expressly authorizes Progressive Security to use the WCTL system to determine vehicle values for total loss claims. You can read Defendant's Answer to Plaintiff's Class Action Complaint at www.SladeTotalLoss.com.

6. Has the Court decided who is right?

The Court has not decided whether Plaintiff or Defendant is right. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiff will win or lose this case.

Questions? Visit www.SladeTotalLoss.com

7. What are the Plaintiffs asking for?

The Plaintiff is asking that the Class be compensated for breach of insurance contract, statutory penalties and attorney's fees under Louisiana Revised Statute 22:1973(A) and (B)(5).

8. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether Progressive Security did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits ever will be obtained. If benefits are obtained, and you do not remove yourself from the Class, you will be compensated or be notified about how to ask for a share of the proceeds.

WHO IS IN THE CLASS

9. Am I part of this Class?

The Court has certified a Class that includes all named Louisiana Progressive Security Insureds who received payment for total loss motor vehicles located in the State of Louisiana, under the terms of their collision automobile insurance policy with Progressive Security Insurance Company, utilizing the Mitchell Work Center Total Loss (WCTL) system, from July 1, 2010 to June 24, 2019.

10. How can I confirm that I am in the Class?

If you are not sure whether you are included in the Class, you can get free help at www.SladeTotalLoss.com.

YOUR RIGHTS AND OPTIONS

11. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing you are staying in the Class and you will be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action. If you stay in the Class and the Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will either be compensated automatically or be notified about how to apply for a share. Keep in mind that if you do nothing now, regardless of whether the Plaintiff wins or loses the trial, you will not be able to sue Progressive Security about any legal claim that is or could have been included in this lawsuit.

12. Why would I ask to be excluded?

If you want to bring your own action against Progressive Security related to the issues presented in this case you should exclude yourself from the Class. Unless you exclude yourself, you give up any right to sue Progressive Security for the claims that are or could have been asserted in this class action. If you choose to exclude yourself, you will not get any money or benefits from this lawsuit even if the Plaintiff obtains them as a result of a trial or from any settlement between Progressive Security and the Plaintiff. If you start your own lawsuit against Progressive Security after you exclude yourself, you will have to hire and pay your own lawyer for that lawsuit, and you will have to prove your claims. If you do exclude yourself so you can start your own lawsuit against Progressive Security, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

13. How do I ask the Court to exclude me from the Class?

To ask to be excluded, also sometimes referred to as "opting out" of the class, you must send an "Exclusion Request" in the form of a letter sent by mail, stating that you want to be excluded from *Slade v. Progressive Security Insurance Co.* Be sure to include your name, policy number and address, and sign the letter. You must mail your Exclusion Request postmarked by **August 29, 2019**, to: **Class Action Opt Out, Attn: Slade v. Progressive Security, PO Box 58220, 1500 John F Kennedy Blvd, Suite C31, Philadelphia, PA 19102**. You may also get an Exclusion Request form at the website, www.SladeTotalLoss.com.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes. The Court appointed the following lawyers, among others, as “Class Counsel” to represent all the members of the Class:

Stephen Murray, Jr.
Murray Law Firm
650 Poydras St., Suite 2150
New Orleans, LA 70130
Phone: 504-525-8100

Kenneth D St Pe
Law Firm of Kenneth D St Pe
311 University Ave, Suite A
Lafayette, LA 70506
Phone: 337-534-4043

If you have questions, you may contact these lawyers. You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, however, 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 is 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?

Class Counsel have not been paid or reimbursed for their time and expenses incurred in pursuing this case. You will not have to pay these fees and expenses. If Class Counsel obtains money or benefits for the Class, they may ask the Court for fees and expenses. If the Court grants Class Counsel’s request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Progressive Security.

WHAT HAPPENS NEXT

17. How and when will the Court decide who is right?

Unless the case is resolved by a settlement or otherwise, Class Counsel will have to prove the Plaintiff’s claims at a trial. No trial date has been set yet. During the trial, a Jury or the Judge will hear all of the evidence to help them reach a decision about whether the Plaintiff or Defendant is right about the claims in the lawsuit.

18. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Plaintiff, and Progressive Security will present the defenses. You or your own lawyer are welcome to come to the trial at your own expense.

GETTING MORE INFORMATION

19. How do I get more information?

Visit the website, www.SladeTotalLoss.com, where you will find the Court’s Order Certifying the Class, the Complaint that the Plaintiff submitted, the Defendant’s Answer to the Complaint.

DATE: June 24, 2019.

Questions? Visit www.SladeTotalLoss.com