

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TISHA HILARIO, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No.: 3:20-cv-05459-WHO

Hon. Judge William H. Orrick

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**NOTICE OF CLASS ACTION SETTLEMENT**

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This Notice is to inform you that a proposed Settlement (“Settlement”) in the above-captioned case (“Lawsuit”) has been reached by the parties and has been granted preliminary approval by the Court supervising this Lawsuit. The purpose of this Notice is to describe the Lawsuit, inform you of the terms of the Settlement, inform you of your right to opt-out of the Settlement, and inform you of your right to object to the Settlement. For the precise terms of the Settlement, please see the settlement agreement available at [www.HilarioSettlement.com](http://www.HilarioSettlement.com), by contacting Class Counsel at [beldridge@hmelegal.com](mailto:beldridge@hmelegal.com), by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California (450 Golden Gate Ave., San Francisco, California), between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. If the Settlement is finally approved, it will resolve all claims in the Lawsuit. A hearing on the Settlement will be held **December 2, 2025 at 2:00 p.m.** to determine whether the Settlement should be granted final approval by the Court.

**PLEASE READ THIS NOTICE. IT DESCRIBES YOUR RIGHTS WITH RESPECT  
TO THE SETTLEMENT OF A CLASS ACTION LAWSUIT.**

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT |                                                                                                                                                                               | DEADLINE                 |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>Do Nothing</b>                                | Receive a payment equal to your proportional share of the Settlement and give up your legal rights to pursue claims against Allstate for the claims asserted in this Lawsuit. | Not applicable           |
| <b>Ask to be Excluded</b>                        | Receive <u>no</u> payment from the Settlement but retain the right to pursue claims against Allstate on your own for the claims asserted in this Lawsuit.                     | <b>November 10, 2025</b> |
| <b>Object</b>                                    | Write to the Court if you object to the terms of the Settlement.                                                                                                              | <b>November 10, 2025</b> |

## BASIC INFORMATION

### 1. Why is there a Notice?

The Court authorized the Notice because you have a right to know about the Settlement of this class action Lawsuit and about your rights to opt-out or object before the Court decides whether to give final approval to the Settlement.

### 2. What is this Lawsuit about?

The Lawsuit alleges that Allstate Insurance Company charged excessive homeowners' insurance premiums to certain California policyholders due to purported "double counting" of built-in garage square footage for California homeowners.

Judge William H. Orrick of the United States District Court for the Northern District of California is overseeing this case. This litigation is known as *Hilario, et al. v. Allstate Insurance Co.*, No. 3:20-cv-05459. The Lawsuit is brought on behalf of an individual and class members, who are called the "Plaintiffs." Allstate Insurance Company is the "Defendant."

### 3. Why is this a class action?

In class actions, an individual called a "Class Representative" sues on behalf of herself and other people with similar claims. All of these people together are the "class members." In this case, the Class Representative is Tisha Hilario. One court resolves the issues for all class members, except for those who exclude themselves.

#### **4. Who is a member of this class?**

The settlement class has been defined by Judge William H. Orrick of the United States District Court for the Northern District of California as:

All California homeowners policyholders of Allstate where: (a) Allstate's internal records reflect the home to have a built-in garage; (b) Allstate included the policy in its corrective action process called Project UIN 203019 ("Project UIN"); and (c) Project UIN increased the square footage of the home in Allstate's internal records to a level that reflects actual or potential double counting of garage space.

You have been identified as a class member.

#### **5. Why is there a Settlement?**

A settlement was reached through a mediation process and negotiations between the parties. By agreeing to settle, both sides avoid the cost and risk of continuing litigation, including the risk that there would be no recovery and therefore no benefit to the class members.

### **THE SETTLEMENT BENEFITS**

#### **6. What does the Settlement provide?**

Under the terms of the parties' Settlement Agreement, Defendant will pay \$4,000,000.00 to settle the Lawsuit ("Total Settlement Fund").

From the Total Settlement Fund, the Court has preliminarily approved cash payments to class members ("Settlement Awards"), service fees to the Class Representative, the costs to administer the Settlement, and Plaintiffs' attorneys' fees. More details are available in a document called the Settlement Agreement which is available on the settlement website – [www.HilarioSettlement.com](http://www.HilarioSettlement.com).

#### **7. How will my payment be calculated?**

The Settlement provides every class member with monetary relief. Each individual Settlement Award will be calculated according to a formula agreed-to by the parties. By utilizing Allstate's data, Settlement Awards will be based upon a number of factors, including, but not limited to, the number of built-in garage bays, the policy years affected, the location of insured property, and the collected premium.

### 8. When will I receive my payment?

Class members will receive their payments via mail after the Court grants final approval to the Settlement and any appeals are resolved (*see* “The Final Approval Hearing” below). If there are appeals, resolving them can take time. Please be patient.

### 9. What am I giving up to stay in the Class?

Unless you exclude yourself from the Settlement, you will give up your right to sue Allstate for the claims being resolved by the Settlement. The specific claims you are giving up against Allstate are those identified as “Released Claims” in the Settlement Agreement, which is available on the settlement website – [www.HilarioSettlement.com](http://www.HilarioSettlement.com). If you have any questions about what this means, you can talk to the law firms listed in Question No. 13 for free or you can talk to your own lawyer.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement and want to keep the right to sue Allstate about the issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself or “opting-out.”

### 10. How do I opt-out of the Settlement?

To exclude yourself from the Settlement, you must mail a statement to the Settlement Administrator, Angeion, with:

- your name, address, and telephone number
- the words “I request to be excluded from the proposed settlement in the case of *Hilario v. Allstate Insurance Company*, Case No. 3:20-cv-05459-WHO”; and
- your signature.

You must mail your opt-out statement, postmarked no later than **November 10, 2025**, to:

Hilario Settlement  
Attn: Exclusions  
PO Box 58220  
Philadelphia, PA 19102

### 11. If I exclude myself, can I still get a payment under the Settlement?

No. You will not get a payment if you exclude yourself from the Settlement.

## OBJECTING TO THE SETTLEMENT

### 12. What do I do if I object to the Settlement?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no Settlement payments will be sent out, and the Lawsuit will continue. If that is what you want to happen, you should object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. To object, you must send a submission to the Court that includes the following:

- your name, address, and telephone number
- the case name: *Hilario v. Allstate Insurance Company*
- the case number: 3:20-cv-05459-WHO
- the name, address, bar number, and telephone number of your counsel, if you are represented;
- the specific reason(s) why you object to the Settlement;
- a detailed list of any other objection(s) to a class action settlement(s) you or your counsel have made in the previous five (5) years, or if you or your counsel have not objected to any other class action settlement in the previous five (5) years, affirmatively state so;
- whether you intend to appear at the Final Approval Hearing, either in person or through counsel, and if you intend to appear, whether you intend to speak at the Final Approval Hearing, either on your own behalf or through counsel; and
- your signature

You must mail your objection, postmarked no later than **November 10, 2025**, to:

Class Action Clerk  
United States District Court for the Northern District of California  
450 Golden Gate Avenue  
San Francisco, California 94102-3489

Please also send a copy to:  
Hilario Settlement  
Attn: Objections  
PO Box 58220  
Philadelphia, PA 19102

## **THE LAWYERS REPRESENTING THE CLASS**

### **13. Who are the lawyers representing the Class?**

The court appointed the following law firms as “Class Counsel”:

Hart McLaughlin & Eldridge, LLC  
Brian Eldridge  
1 South Dearborn Street, Suite 1400  
Chicago, Illinois 60603  
Telephone: (312) 955-0545  
Website: [www.hmelegal.com](http://www.hmelegal.com)

Shane Law, LLC  
David Shane  
1000 Drakes Landing Road, Suite 200  
Greenbrae, California 94904  
Telephone: (415) 464-2020  
Website: [www.shanelawmarin.com](http://www.shanelawmarin.com)

You may contact these lawyers with any questions you have and will not be charged for doing so. If you want to be represented by your own lawyer, you may hire one at your own expense.

### **14. How will the lawyers be paid?**

Class Counsel will ask the Court for attorneys’ fees up to one-third of the Total Settlement Fund, or \$1,333,333.33. Class Counsel represented Plaintiffs in this Lawsuit on a contingency fee basis, which means they agreed that they would only be paid for their time and services and reimbursed for costs and expenses if there was a recovery. This also means that the lawyers and law firms accepted the risk that if there was no recovery, they would not be paid for the legal services and that they would not be reimbursed for the costs and expenses they advanced to prosecute this Lawsuit.

Class Counsel will also ask the Court to approve the costs and expenses incurred in prosecuting this case, which are approximately \$170,000.00. The costs and expenses include, but are not limited to,

filing fees, court reporter fees, deposition transcripts, expert witness fees, mediation fees, and fees payable to the Settlement Administrator. The reason the costs and expenses are approximated is because the full and final amount owed to the Settlement Administrator will not be known until the Settlement is finalized.

## **THE FINAL APPROVAL HEARING**

### **15. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a Final Approval Hearing, which is currently scheduled for **December 2, 2025 at 2:00 p.m.**, at the United States District Court for the Northern District of California, 450 Golden Gate Avenue, 17th Floor, Courtroom 2, San Francisco, California 94102. The hearing may be moved to a different date or time without additional notice to you, so it is a good idea to check the Settlement website – [www.HilarioSettlement.com](http://www.HilarioSettlement.com) or the Court's docket, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement.

### **16. Do I have to attend the hearing?**

No. You or your own lawyer may attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it.

### **17. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include that information in your objection as described in Question No. 12.

## **MORE INFORMATION**

### **18. Does Allstate have the correct square footage for my home?**

Allstate's record of square footage of your home, may be out of alignment with the current, actual square footage of your home. Please consult with your individual agent to determine what course of action, if any, to take regarding Allstate's record of square footage of your home. If you take no action, Allstate's record of square footage will remain.

#### **19. How do I get more information?**

More information concerning this Settlement can be found at [www.HilarioSettlement.com](http://www.HilarioSettlement.com), where, in addition to this Class Notice, you can find the Class Action Settlement Agreement, Motion for Preliminary Approval, and Preliminary Approval Order. If you have questions, you may contact Class Counsel.

**Do not contact the Judge or his staff and do not contact any attorneys for Allstate Insurance Company.**