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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

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APARACIO, GRISELDA DAVILA, LUIZ
SANCHEZ, ROBERT GALLEGOS, ROBERTO
VARGAS, JESSICA CHANG, CRYSTAL
FLOWERS, ANDY NGUYEN, CHARLES
SMITH, JAVIER HURTADO, MARCO
AVILLA, CARLOS ANDRADE, ARLENE
MARTINEZ, SALLY GREENE, DANIELLE
TOLKSON AND TIANA VALE, AS
INDIVIDUALS AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED,

Plaintiff(s),
vs.

NATIONAL GENERAL INSURANCE
COMPANY, INTEGON NATIONAL
INSURANCE COMPANY, STONEWOOD
INSURANCE SERVICES, INC., ALL STAR
GENERAL INSURANCE AGENCY, INC., ALL
STAR GENERAL INSURANCE COMPANY,
NEW MILLENNIUM INSURANCE, FREEWAY
INSURANCE SERVICES, ONE WAY
INSURANCE SERVICES, JACK OLIVERA
INSURANCE SERVICES. COST-U-LESS

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

AUG - 3 2026

BY Jessica Garcez
JESSICA GARCEZ, DEPUTY

CASE NO.: CIVDS1914609

Hon. Joseph Ortiz, Dept. S17

**NOTICE OF STIPULATION AND
[PROPOSED] ORDER RE: FORMAT
OF CLASS NOTICE**

1 INSURANCE CENTER, MARISOL'S
2 INSURANCE SERVICES, INC., AUTO CLUB
3 SERVICES, LLC, TORRES & ASSOCIATES,
4 FIRST CONTEMPO INSURANCE AGENCY,
5 FIESTA AUTO INSURANCE CENTER;
6 UPGRADE INSURANCE SERVICES, INC.;
7 AND DOES 1 THROUGH 120,

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9 Defendant(s),
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12 I, Jonathan King, am counsel for Plaintiffs in this matter. I declare, under penalty of
13 perjury under the laws of the state of California, as follows:

14 1. At a March 11, 2026 hearing, the Court certified a class, ordered the parties to
15 meet and confer regarding class notice, and ordered the parties to submit a proposed class notice
16 by April 10, 2026.

17 2. Unable to reach agreement on the language of that notice, Plaintiffs filed, on June
18 5, 2026, an "Ex Parte Application for an Order Adopting the Form of Class Notice," asking the
19 Court to resolve the parties' differences. That application was first heard on June 9 at 8:30 a.m.
20 in Department S17. However, at the conclusion of that hearing, the Court asked the parties to
21 meet and confer further on the disputed issues, and the Court continued the hearing to June 23,
22 2026 at 1:30 p.m.—30 minutes after an already scheduled an Informal Discovery Conference.

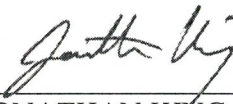
23 3. At that 1:00 p.m. Informal Discovery Conference on June 23, 2026, in the
24 presence of the Court, the parties reached agreement on the language of the class notice. The
25 parties orally stipulated in the presence of this Court to giving class notice in the form attached
26 as **Exhibit 1**, and Plaintiffs withdrew their ex parte application.

27 4. Attached as **Exhibit 1** is a true and correct copy of the class notice the parties
28 stipulated to.

1 Plaintiffs respectfully ask this Court to adopt the parties' stipulation and, pursuant to
2 California Rules of Court, rule 3.766, order that notice of this class action be given to the class
3 members in the form attached as Exhibit 1. The notice administrator will make non-substantive
4 changes to the form of notice attached as Exhibit 1 (for example, to reflect the date of the Court's
5 approval of the form of class notice, the opt-out deadline, and the notice administrator's mailing
6 address, website, email address, and toll-free phone number).

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8 Dated: July 23, 2026

LAW OFFICES OF JUSTIN H. KING

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11 JONATHAN KING
12 Attorneys for Plaintiffs & Class Counsel
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1 **ORDER**

2 Pursuant to the stipulation of the parties, the Court orders that notice of this class action
3 be given to the class members in the form attached as Exhibit 1.

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6 Dated: Aug. 3, 2026

7 Joseph Ortiz
8 JUDGE OF THE SUPERIOR COURT
9 JOSEPH T. ORTIZ
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Exhibit 1

PLEASE READ THIS NOTICE CAREFULLY. THIS NOTICE IS GIVEN UNDER CALIFORNIA LAW AND HAS BEEN APPROVED BY ORDER OF THE COURT DATED _____, 2026.

A class action lawsuit may affect your legal rights if you purchased a California automobile insurance policy underwritten by Integon National Insurance Company (a “National General” branded company) that was rescinded on or after May 14, 2015 based on an alleged failure to disclose a household member on your insurance application. **Please read this notice carefully.**

The case — *Cobos, et al. v. National General Insurance Company et al.*, Case No. CIVDS1914609 — is currently pending before the Honorable Judge Joseph T. Ortiz in the Superior Court of California, San Bernardino County.

In a class action, one or more people sue on behalf of all people who have similar claims. Together, all of these people are called a Class and the individuals are called Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves (opt-out) from the Class.

NATURE OF THE ACTION

Individuals who purchased a California automobile policy underwritten by Integon National Insurance Company that was rescinded on or after May 14, 2015 based on an alleged failure to disclose household members on an insurance application (referred to as “Plaintiffs”) have sued National General Insurance Company, Integon National Insurance Company, and National General Management Corp. (referred to as “Defendants”). Plaintiffs allege that Defendants improperly rescinded policies and denied collision claims for each Class Member. Plaintiffs assert breach of contract and bad faith causes of action under California law and seek damages in the form of recovery of either the insured’s vehicle repair costs or the fair market value of the insured’s vehicle, as well as punitive damages. Defendants deny these allegations and dispute liability. The case is currently set for trial on March 1, 2027.

OPTIONS

At this time, you may either do nothing and remain a member of the Class or request exclusion (“opt-out”) of the Class.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:

**OPTION 1:
Remain a
Member of the
Class**

If you elect Option 1, **you do not need to do anything at this time.** It will cost you nothing to remain a member of the Class, and if the judge or jury orders any recovery, you will receive a share of it. However, if Defendants prevail, you will not be able to pursue a separate claim against Defendants arising out of these claims.

	Any judgment obtained on the common issues in this action, whether favorable or not, will bind all Class Members who do not opt-out (exclude themselves) from this proceeding. You may receive a later notice advising you of the outcome of this case and your right to participate in any recovery, if any recovery is ordered. As a member of the Class, you will not be responsible for Class Counsels' attorneys' fees or costs except that the Court may award fees and costs to Class Counsel out of any recovery achieved on behalf of the Class. You may, if you so desire, enter an appearance on your own.
OPTION 2: Opt-Out from the Class	If you elect Option 2 and wish to opt-out (exclude yourself) from this proceeding, you must take affirmative steps to do so. You must mail a written notice stating your desire to do so, postmarked by no later than [ADMINISTRATOR TO INSERT DATE 45 DAYS FROM DATE OF MAILING], to the following address: Cobos et al. v. National General Insurance Company et al. Litigation [ADDRESS TO BE PROVIDED BY ADMINISTRATOR] By electing to be excluded, (1) you will not share in any potential recovery that might be obtained by the Class as a result of trial or settlement of this lawsuit; (2) you will not be bound by any decision in this lawsuit favorable to Defendants; and, (3) you may be free to present any claims you have against the Defendants by filing your own lawsuit, at your own cost, and to seek different or additional damages than those being sought by the class. To be valid, each request to opt-out of the Class must (i) state the name, address, email address, and telephone number of the person seeking exclusion; and, (ii) clearly state that the person requests exclusion from the Class in <i>Cobos et al. v. National General Insurance Company et al.</i> Any such request must be signed by the person requesting exclusion. Class Counsel will then notify the Court of any such opt-out requests. Opt-out requests shall not be effective unless they include the above-noted required information and are made within the time period stated above.

THE CLASS DEFINITION

The Court has certified this case as a class action on behalf of all individuals who satisfy the following criteria:

- (1) the individual was a named insured on a California automobile insurance policy that was underwritten by Integon National Insurance Company;

- (2) the individual or another named insured on that individual's policy was involved in an automobile accident while driving an insured vehicle;
- (3) a post-accident claim was made under the policy for losses from that accident;
- (4) the individual had his or her insurance policy rescinded between May 14, 2015, and the present;
- (5) the individual had his or her insurance policy rescinded after a claim was made under the policy;
- (6) the individual had his or her insurance policy rescinded solely for failure to disclose household members on the insurance application; and,
- (7) the individual suffered losses because of the policy rescission.

The Court also defined a Renewal Sub-class as, "All Class Members whose automobile insurance policies renewed during the Class Period."

CLASS COUNSEL

The Court has also appointed the following individuals and law firms to function as counsel for the Class ("Class Counsel"):

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You have the right to retain your own attorney (although you are not required to do so). If you retain your own attorney, you will be responsible for his or her fees and costs.

MORE INFORMATION

This Notice contains only a summary of the litigation. The operative Complaint, the Court's class certification order, and other relevant documents related to this lawsuit can be accessed at [WEB ADDRESS TO BE PROVIDED BY ADMINISTRATOR]. Please check this site for updates on the status of this action and any further dates set by the Court. If you have any questions, please call the Class Notice Administrator at [ADMINISTRATOR TO PROVIDE TOLL-FREE NUMBER]. You may also write to Class Counsel at the addresses provided above. **INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT.**

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PROOF OF SERVICE
CCP 1013A(3)

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 8301 Utica Avenue, Suite 101, Rancho Cucamonga, CA 91730.

On July 23, 2026, I served the foregoing document described as:

**NOTICE OF STIPULATION AND [PROPOSED] ORDER RE: FORMAT OF CLASS
NOTICE**

on all interested parties in this action by transmitting an electronic copy as follows:

SEE ATTACHED SERVICE LIST

☐ **BY MAIL (CCP §1013(a) and §2015.5):** I served the documents by placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's business practice for collecting and processing documents for Mailing. On the same day the document is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage date is more than 1 day after the date of deposit for mailing in affidavit.

☐ **BY OVERNIGHT DELIVERY (CCP §1013(c) and §2015.5):** I sealed such documents in separate envelopes to each addressee and deposited each for collection by mailing via overnight mail/next day delivery in a box or other facility regularly maintained by the U.S. Postal Service or an Express Service carrier, or delivered to an authorized carrier or driver authorized by the U.S. Postal Service or an Express Service carrier to receive documents, with delivery fees paid or provided.

☒ **BY ELECTRONIC SERVICE (CCP §1010.6 and CRC 2.251):** I caused the documents to be sent via electronic mail to the addressees at the electronic notification listed on the Service/Mailing List.

Executed on July 23, 2026, at Rancho Cucamonga, California.

☒ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Gabriela Preciado

GABRIELA PRECIADO

ATTACHED MAILING LIST

Cobos, et al. V. National General Insurance, et al.

SBSC, Case No.: CIVDS1914609

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