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

TAMIKA MILLER, JULIANNE  
CHUANROONG, and STEPHANIE  
ALLEN on behalf of themselves, the general  
public, and those similarly situated,

Plaintiffs,

v.

TRAVEL GUARD GROUP, INC., AIG  
TRAVEL, INC., and NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA,

Defendants.

Case No. 3:21-cv-09751-TLT

**DECLARATION OF STEVEN WEISBROT  
OF ANGEION GROUP, LLC  
RE: SETTLEMENT ADMINISTRATION**

1 I, Steven Weisbrot, declare and state as follows:

2 1. I am the President and Chief Executive Officer at the class action notice and claims  
3 administration firm Angeion Group, LLC (“Angeion”). I have personal knowledge of the matters  
4 stated herein.

5 2. My credentials were previously reported to this Court in my prior declaration (the “Notice  
6 Plan Declaration”) (Dkt. No. 173-7).

7 3. Angeion was retained by the Parties and appointed by the Court to serve as the Settlement  
8 Administrator. In this role, Angeion’s tasks included, among other tasks, (1) to provide notice to  
9 potential Class Members; (2) to respond to Class Members inquiries; (3) to receive and process  
10 Class Member Claim Forms, exclusion requests and objections; and (4) to perform other duties as  
11 specified in the *Stipulation of Class Action Settlement* (“Settlement Agreement”) or by the order(s)  
12 of the Court, including but not limited to the *Order Granting Motion for Preliminary Approval of*  
13 *Class Action Settlement* (“Preliminary Approval Order”) entered on April 9, 2024.

14 4. Angeion is not related to or affiliated with the Plaintiffs, Plaintiffs’ Counsel, Defendants  
15 or Counsel for Defendants.

16 5. The purpose of this Declaration is to provide the Court and the Parties with a summary of  
17 the work performed to date to effectuate the Notice Plan approved by this Court.

18 **NOTICE PURSUANT TO THE CLASS ACTION FAIRNESS ACT 28 U.S.C. § 1715**

19 6. On February 2, 2024, pursuant to 28 U.S.C. § 1715, Angeion, on behalf of the Defendants,  
20 caused notice regarding the settlement to be sent to the Attorneys General of all U.S. states and  
21 territories, as well as the Attorney General of the United States (“CAFA Notice”). As of the date  
22 of this Declaration, Angeion has not received any correspondence or objections from any  
23 governmental agencies. Angeion understands representatives of California and Washington  
24 communicated directly with counsel for the parties. The CAFA Notice was sent in the same form  
25 as **Exhibit A** attached hereto.

**CLASS LIST**

7. On or about April 15, 2024, Angeion received from Counsel for Defendants, two spreadsheets containing 15,618,855 transactional records with Class Member data. The records contained the following data, to the extent available: Class Member name; last known mailing address; email address; plan #; reservation date; and assistance fees paid.

8. Angeion reviewed the 15,618,855 records provided and merged records where it was evident that the plans were purchased by the same person (*i.e.*, records with the same exact name and email address). The resulting merged records comprised the “Notice List” used for disseminating notice via email and mail, with results summarized in the chart below:

Description	Count
Initial Total Transactional Records	15,618,855
Unique Merged Records	10,687,524
Merged Records with an Email Address	10,687,524
Merged Records with a Mailing Address	3,434,877

**DIRECT NOTICE**

**Email Notice**

9. Prior to sending Email Notice, Angeion subjected the email addresses on the Notice List to a cleansing and verification process.<sup>1</sup> As a result of the cleansing and verification process, 10,211,318 email addresses were identified as valid, and 476,206 were identified as invalid.

10. Beginning on May 7, 2024, Angeion caused the Email Notice to be sent to the 10,211,318 valid email addresses on the Notice List. Of the emails sent, 9,279,825 were delivered, and 931,493 were unable to be delivered. A true and accurate copy of the Email Notice is attached hereto as **Exhibit B.**

11. The 931,493 records whose Email Notice could not be delivered were subjected to an reverse lookup in an attempt to identify an updated email address based on the data points available (*i.e.*, name and prior email address). The reverse lookup search identified 194,845 updated email addresses. Angeion updated the Notice List with these updated email addresses.

<sup>1</sup> See Dkt. No. 173-7, ¶ 24.

1 12. On May 23, 2024, Angeion caused the Email Notice to be sent to the 194,845 valid email  
2 addresses identified from this reverse lookup. Of the emails sent, 166,733 were delivered, and  
3 28,112 could not be delivered.

4 13. As a result of above-described efforts, a total of 9,446,558 Email Notices were delivered  
5 to the 10,687,524 unique merged records, representing a deliverability rate of approximately  
6 88.4% for the unique merged records with email addresses.

7 **Reminder Email Notices**

8 14. Beginning on June 4, 2024, Angeion caused a reminder email notice (the “Reminder Email  
9 Notice”) to be sent to the 9,317,520 email addresses to which the initial Email Notice had been  
10 delivered and which were not already associated with a submitted claim, exclusion request, or  
11 request to unsubscribe from receiving future email notifications. In total, 8,988,208 Reminder  
12 Email Notices were delivered, and 329,312 could not be delivered. A true and accurate copy of  
13 the Reminder Email Notice is attached hereto as **Exhibit C**

14 15. Prior to the claims filing deadline, Angeion will cause a second reminder email notice  
15 (“Second Reminder Email Notice”) to be sent to all Class Members whose prior Email Notices  
16 were deliverable, and which are not already associated with a submitted claim, exclusion request,  
17 or request to unsubscribe from receiving email notices.

18 **Postcard Notice**

19 16. Of the 1,240,966 parent records in the Notice List which did not receive an initial Email  
20 Notice (because of issues with validity and/or delivery, as noted above), 388,599 had a valid  
21 mailing address. On June 5, 2024, Angeion caused the Postcard Notice to be mailed to those  
22 388,599 mailing addresses in the Notice List via USPS first class mail, postage prepaid. A true and  
23 accurate copy of the Postcard Notice is attached hereto as **Exhibit D**.

24 17. Prior to mailing, Angeion processed the mailing addresses on the Notice List through the  
25 United States Postal Service (“USPS”) National Change of Address (“NCOA”) database to  
26 identify updated addresses for Class Members who had moved in the last four years and filed a  
27 change of address card with the USPS.

28

1 18. As of July 9, 2024, the USPS has returned 1,675 Postcard Notices as undeliverable with a  
2 forwarding address. Angeion updated the Notice List and has re-mailed Postcard Notices to those  
3 1,675 updated addresses.

4 19. As of July 9, 2024, a total of 73,017 Postcard Notices have been returned by the USPS as  
5 undeliverable without a forwarding address. Angeion conducted address verification searches  
6 (“skip traces”) in an attempt to locate updated addresses for these records. The skip trace efforts  
7 identified updated addresses for 47,338 unique merged records. Angeion updated the Notice List  
8 and re-mailed Postcard Notices to the 47,338 updated addresses. Of the re-mailed Postcard Notice,  
9 none have been returned by the USPS a second time.

10 20. Accordingly, as of the date of this Declaration, a total of 362,920 Postcard Notices were  
11 delivered<sup>2</sup>, in addition to the 9,446,558 Email Notices that were delivered. Altogether, direct  
12 notices of the Settlement were delivered to approximately 92% of the unique merged records in  
13 the Notice List.

14 **CLAIM STIMULATION EFFORTS**

15 21. In addition to the comprehensive direct notice efforts described above, the following notice  
16 tactics will be utilized to further engage Class Members and promote participation in the  
17 Settlement.

18 22. On or about July 10, 2024, Angeion will commence a media advertising campaign  
19 comprised of social media advertising via Facebook, Instagram, X and Reddit, and a paid search  
20 campaign via Google. The social media advertising will consist of two campaigns, (1) the direct,  
21 targeted social media notice will be implemented by uploading known Class Member email  
22 addresses directly to Facebook and Instagram. If any of the email addresses are used as the primary  
23 log-on email address for these platforms, Angeion will be able to contact those specific Class  
24 Members on a one-to-one basis via internet ads displayed on these platforms; and (2) an interest-  
25 based approach which focuses on the interests that users exhibit while on the social media  
26 platforms Facebook, Instagram, X, and Reddit, to target advertisements to individuals most likely

27 <sup>2</sup> For purposes of this analysis, a Postcard Notice is considered “delivered” if it was mailed and not returned by  
28 the USPS as undeliverable, or remailed to an updated address and not returned as undeliverable.

1 to be Class Members. The social media campaign will engage with these individuals via desktop  
2 sites, mobile sites, and mobile apps.

3 **SETTLEMENT WEBSITE & TOLL-FREE TELEPHONE SUPPORT**

4 23. On or around May 7, 2024, Angeion established the following website dedicated to this  
5 Settlement: [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) (“Settlement Website”). The Settlement Website  
6 contains online portals whereby Class Members may securely submit a Claim Form or opt-out of  
7 the settlement. The Website also has a portal where potential Class Members can look up their  
8 login information by submitting their Travel Guard Policy Number and their last name.  
9 Additionally, the Notice, Claim Form, Opt-out Form, Settlement Agreement, Preliminary  
10 Approval Order, and other settlement related documents are available to review or download. The  
11 Settlement Website also has a “Frequently Asked Questions” page which provides answers to  
12 common inquiries about the Settlement to anyone who visits the website, and a “Contact Us” page  
13 which provides potential Class Members with the mailing address, phone number and email  
14 address to contact the Settlement Administrator or Class Counsel. True and accurate copies of the  
15 Long Form Notice, Claim Form and Opt-out Form are attached hereto as **Exhibits E, F and G**  
16 respectively.

17 24. As of July 9, 2024, the Settlement Website has had 509,119 unique visitors resulting in  
18 1,021,080 page views.

19 25. On or around May 7, 2024, Angeion also established the following toll-free hotline  
20 dedicated to this Settlement to further apprise Class Members of their rights and options in the  
21 Settlement: 1-888-255-2501. The toll-free hotline utilizes an interactive voice response (“IVR”)  
22 system to provide potential Class Members with responses to frequently asked questions and  
23 provides essential information regarding the Settlement. The hotline is accessible 24 hours a day,  
24 7 days a week. Additionally, potential Class Members can leave a voicemail via the toll-free  
25 hotline to request that a copy of the Notice or Claim Form be mailed to them.

26 26. As of July 9, 2024, the toll-free hotline has received 3,715 calls totaling 15,703 minutes.  
27  
28

1 **CLAIM FORM SUBMISSIONS.**

2 27. The deadline for Class Members to submit a Claim Form is August 13, 2024. As of the  
3 date of this Declaration, Angeion has received 172,448 Claim Forms (2,005 via mail, 170,443 via  
4 the online portal). It is important to note that these Claim Form submissions often represent more  
5 than a single travel plan purchase. These Claim Form submissions are subject to an ongoing audit  
6 and review, including a review for duplicative, fraudulent, or unqualified submissions.  
7 Additionally, Angeion will analyze these submitted claims against the data set to continue to try  
8 match additional related travel plans. This is an ongoing effort.

9 28. Angeion will continue to report to the Parties the number of Claim Form submissions it  
10 receives and will provide updates to them regarding the determination and processing of claims.

11 **REQUESTS FOR EXCLUSION, AND OBJECTIONS**

12 29. The deadline for Class Members to exclude themselves from the Settlement is August 13,  
13 2024. As of the date of this declaration, Angeion has received 254 exclusion requests<sup>3</sup> (2 via mail  
14 and 252 via the online portal). A table summarizing the exclusions received is attached hereto as  
15 **Exhibit H.**

16 30. The deadline for Class Members to object to the Settlement is August 13, 2024. As of the  
17 date of this declaration, Angeion has received two (2) objections to the Settlement. Copies of the  
18 objections received by Angeion are attached hereto as **Exhibit I.**

19 31. Angeion will continue to keep the Parties apprised of additional requests for exclusion and  
20 objections received.

21 **NOTICE & ADMINISTRATION COSTS**

22 32. Through May 31, 2024, Angeion has incurred \$316,113.52 in notice and administration  
23 costs.<sup>4</sup> Angeion will continue to keep the Parties apprised of the notice and administration costs  
24 incurred on a regular monthly basis and can provide the Parties and the Court with an estimate of  
25 remaining costs upon the passing of the Claim Form deadline.

26  
27 \_\_\_\_\_  
<sup>3</sup> Four of the exclusion requests received are duplicative, resulting in 250 unique exclusion requests received.

28 <sup>4</sup> Of these costs, approximately 54% is associated with sending postcard notice via USPS.

**CONCLUSION**

33. The Notice Plan implemented for this Settlement featured comprehensive direct notice efforts, including multiple email notice attempts, mailed notice, and additional reminder email notices, complemented by the implementation of a dedicated Settlement Website and toll-free telephone support. In addition, the targeted and interest based social media advertisements and paid search campaign claim stimulation efforts will further notice potential Class Members about the settlement.

34. It remains my professional opinion that the Notice Plan described herein provided full and proper notice to the Settlement Class before the claims, opt-out and objection deadlines, and was the best notice practicable under the circumstances, fully comporting with due process, Fed. R. Civ. P. 23, and the Northern District’s Procedural Guidance for Class Action Settlements.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: July 9, 2024

  
STEVEN WEISBROT

# **Exhibit A**



1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
www.angeiongroup.com  
215.563.4116 (P)  
215.525.0209 (F)

February 2, 2024

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**  
3:21-cv-09751-TLT

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendants in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

**Case Name:** Miller et al v. Travel Guard Group, Inc. et al  
**Index Number:** 3:21-cv-09751-TLT  
**Jurisdiction:** United States District Court Northern District of California  
**Date Settlement Filed with Court:** January 24, 2024

In accordance with the requirements of 28 U.S.C. § 1715, copies of the following documents associated with this action are available at <https://www.angeiongroup.com/cafa/>.

- 1. 28 U.S.C. § 1715(b)(1)-Complaint:** The *Class Action Complaint for Unfair Business Practices; False Advertising; and Fraud, Deceit, and/or Misrepresentation* was filed with the Court on December 17, 2021. The *Amended Class Action Complaint* was filed with the Court on January 24, 2024.
- 2. 28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** The Plaintiff's Notice of Motion and Motion for Approval of Class Action Settlement is set for February 27, 2024, at 2:00 p.m. before the Honorable Judge Trina L. Thompson in Courtroom 9 (19<sup>th</sup> Floor), 450 Golden Gate Avenue, San Francisco, California 94102.
- 3. 28 U.S.C. § 1715(b)(3)-Notification to Class Members:** The proposed *Long Form Notice, Email Notice, Postcard, Claim Form, and Opt-Out Form* were filed with the Court on January 24, 2024.
- 4. 28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** The *Stipulation of Class Action Settlement* was filed with the Court on January 24, 2024. The *Order Granting Preliminary Approval of Class Action*

CAFA Notice of Class Action Settlement

*Settlement; Provisionally Certifying the Class; and Directing Dissemination of Notices to the Class (As Modified), the Plaintiffs' Notice of Motion and Motion for Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof, and the Declaration of Seth Safier ISO Approval of Class Settlement were filed with the Court on January 24, 2024. The Plaintiffs' Motion for Class Certification; Memorandum of Points and Authorities in Support Thereof was filed with the Court on September 26, 2023.*

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** Other than the *Stipulation of Class Action Settlement*, the parties believe no such agreement falls within the scope of 1715(b)(5). However, in the interest of full disclosure, Defendants are also settling on an individual basis with a Massachusetts resident (not a member of the Settlement-Notice Class and not a party to the Actions) represented by class counsel Gutride & Safier, LLP. Gutride & Safier LLP is not receiving any costs or fees or other payment in connection with that settlement.
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice and no finding or admission of wrongdoing has been made.
7. **28 U.S.C. § 1715(b)(7)-Estimate of Class Members:** The Settlement Class contains approximately 25 million Class Members located throughout California and Washington. There are approximately 17 million Class Members in California and approximately 8 million Class Members in Washington. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the Class Member submission of a claim form and will depend on the amount of the Assistance Fees included in the Qualifying Travel Guard Plans each Class Member purchased.
8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time.

If you have questions or concerns about this notice, the proposed settlement, or difficulty accessing the associated documents, please contact this office.

Sincerely,

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839  
info@angeiongroup.com

# **Exhibit B**

**From:** Travel Fee Settlement Administrator <donotreply@travelfeesettlement.com>

**Sent:** Tuesday, May 7, 2024 10:01 AM

**To:**

**Subject:** Notice of Class Action Settlement re Travel Guard Insurance Plans



United States District Court for the  
Northern District of California

*Miller et al. v. Travel Guard Group, Inc. et al.*  
Case No. 21-cv-09751-TLT

**Class Action Settlement Notice Re:  
Travel Guard Insurance Plans**

*Authorized by the U.S. District Court*

**YOU MAY BE ENTITLED TO BENEFITS UNDER A CLASS ACTION SETTLEMENT  
RELATING TO ASSISTANCE FEES INCLUDED IN TRAVEL GUARD PLANS.**

**Class Member Identification Number:**

**Confirmation Code:**

- This class action settlement will affect your rights even if you do not claim your benefits.
- Travel Guard has agreed to pay a total Settlement Amount of \$23,997,500, from which Cash Payments may be made to affected Settlement Class Members.
- To receive a Cash Payment, you must submit a Claim Form by August 13, 2024.
- You have the right to exclude yourself from the Settlement, but must do so by August 13, 2024.
- In these Actions, Plaintiffs allege that Travel Guard charges more than it is legally or fairly allowed to charge for its travel insurance plans. Travel Guard disputes Plaintiffs' allegations.
- The Settlement relates only to the price you paid for each Travel Guard Plan. The Settlement will not change your insurance coverages or your claims for benefits.

Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) to learn about the Settlement, your options, and important dates.

A federal court authorized this notice; it is not a solicitation from a lawyer.

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call toll-free 1-888-255-2501 or email [info@TravelFeeSettlement.com](mailto:info@TravelFeeSettlement.com).

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***[Unsubscribe](#)***

# **Exhibit C**

**From:** Travel Fee Settlement Administrator <donotreply@travelfeesettlement.com>

**Sent:** Tuesday, June 4, 2024 4:01 PM

**To:**

**Subject:** Reminder Notice of Class Action Settlement re Travel Guard Insurance Plans

**United States District Court for the  
Northern District of California**

***Miller et al. v. Travel Guard Group, Inc. et al.,  
Case No. 21-cv-09751-TLT***

**Class Action Settlement Notice Re:  
Travel Guard Insurance Plans**

*Authorized by the U.S. District Court*

**YOU MAY BE ENTITLED TO BENEFITS UNDER A CLASS ACTION SETTLEMENT  
RELATING TO ASSISTANCE FEES INCLUDED IN TRAVEL GUARD PLANS.**

**Class Member Identification Number:**

**Confirmation Code:**

- This class action settlement will affect your rights even if you do not claim your benefits.
- Travel Guard has agreed to pay a total Settlement Amount of \$23,997,500, from which Cash Payments may be made to affected Settlement Class Members.
- To receive a Cash Payment, you must submit a Claim Form by August 13, 2024.
- You have the right to exclude yourself from the Settlement, but must do so by August 13, 2024.
- In these Actions, Plaintiffs allege that Travel Guard charges more than it is legally or fairly allowed to charge for its travel insurance plans. Travel Guard disputes Plaintiffs' allegations.
- The Settlement relates only to the price you paid for each Travel Guard Plan. The Settlement will not change your insurance coverages or your claims for benefits.

Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) to learn about the Settlement, your options, and important dates.

A federal court authorized this notice; it is not a solicitation from a lawyer.

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call toll-free 1-888-255-2501 or email [info@TravelFeeSettlement.com](mailto:info@TravelFeeSettlement.com).

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[\*\*\*Unsubscribe\*\*\*](#)

# **Exhibit D**

**NOTICE OF CLASS  
ACTION SETTLEMENT  
RE: TRAVEL GUARD  
INSURANCE PLANS**

*Miller v. Travel Guard Group, Inc.,*  
Case No. 21-cv-09751 (N.D. Cal.)

**You may be entitled to a cash  
payment from a class  
action settlement.**

**For more information visit  
[www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com)**

Travel Fee Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE PAID  
MAG

**Electronic Service  
Requested**



NUMERIC EQUIVALENT

Postal Service: Please do not mark barcode

Notice ID: <<Notice ID>>

Confirmation Code: <<Confirmation Code>>

<<First Name>><<Last Name>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

<<Country>>

**WHY AM I RECEIVING THIS NOTICE?** Travel Guard's records indicate you may be a member of the class whose claims will be resolved by this Settlement. Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) for more information. A federal court authorized this notice; it is not a solicitation from a lawyer.

**WHAT IS THE CASE ABOUT?** Plaintiffs allege that Travel Guard charges more than it is legally or fairly allowed to charge for its travel insurance plans. Travel Guard disputes Plaintiffs' allegations.

**HOW DO I GET A CASH PAYMENT?** To get a Cash Payment, you must submit a simple Claim Form, either online at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com), or by mailing it to the Settlement Administrator at: Travel Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. Your Claim Form must be submitted online or postmarked to the Settlement Administrator by 11:59 p.m. Pacific Time on **August 13, 2024**. If you submit a Valid Claim and the Court approves the Settlement, your Cash Payment will depend on the total amount of Assistance Fees you paid. The Net Settlement Fund will be distributed among Authorized Claimants in proportion to the amount of Assistance Fees paid by each Authorized Claimant.

**WHAT ARE MY OPTIONS?** You may submit a Claim Form for a Cash Payment, opt out of the Settlement, object to the Settlement, or do nothing. To receive a Cash Payment, you must submit a Claim Form. To opt out, you must submit an exclusion request. If you opt out of the Settlement, you may pursue a separate lawsuit, but you will receive no Cash Payment. If you do not opt out, you give up your right to bring a separate lawsuit. To object to the Settlement, your written objection must include all the required objection information. See [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com).

Claim Forms and opt-out requests must be either postmarked or submitted online by **August 13, 2024**. Objections must be filed with the Court or postmarked by **August 13, 2024**. **Do Nothing** and you will not receive a Cash Payment and you will release claims against Defendants that relate to the allegations in the Actions.

**For more information visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call the Administrator at 1-888-255-2501.**

# **Exhibit E**



United States District Court for the  
Northern District of California

*Miller et al. v. Travel Guard Group, Inc. et al.*,  
Case No. 21-cv-09751-TLT

## Class Action Settlement Notice Re: Travel Guard Insurance Plans

*Authorized by the U.S. District Court*

**Did you buy a Travel Guard travel insurance plan between December 17, 2017, and January 18, 2024?**

*Travel Guard insurance plans are sold through a variety of distribution channels, including Expedia and United Airlines.*

You may be eligible to receive a payment from a \$23,997,500 Settlement.

*The Settlement may affect your rights.*

**Your options:**

- 1. Make a claim.** *Get a payment.*
- 2. Do nothing.** *You will get no payment and be bound by the Settlement.*
- 3. Opt out of the Settlement.**
- 4. Object to the Settlement.**

**You are not being sued.**

This notice explains the Actions, the Settlement, and your legal rights and options.

Please read the entire notice carefully.

*This is not a solicitation from a lawyer.*

**You need to make a decision about the Settlement.**

**To make the best decision for you, read on.**

## WHAT THIS NOTICE CONTAINS

<b>What Is This Notice About? .....</b>	<b>2</b>
<b>What Are My Options? .....</b>	<b>3</b>
<b>What Are the Actions About? .....</b>	<b>4</b>
<b>What Has Happened in the Actions? .....</b>	<b>4</b>
<b>Am I a Class Member? .....</b>	<b>5</b>
<b>What Can I Get from the Settlement? .....</b>	<b>5</b>
<b>How Do I Request a Cash Payment? .....</b>	<b>6</b>
<b>When Do I Get My Cash Payment? .....</b>	<b>6</b>
<b>What Do Plaintiffs, Proposed Intervenors, and Class Counsel Get? .....</b>	<b>6</b>
<b>What Happens if I Do Not Opt Out of the Settlement? .....</b>	<b>7</b>
<b>Does This Settlement Affect Insurance Claims Under Travel Guard Policies? .....</b>	<b>8</b>
<b>How Do I Opt Out of the Settlement? .....</b>	<b>8</b>
<b>How Do I Object to the Settlement? .....</b>	<b>9</b>
<b>When Will the Court Decide If the Settlement Is Approved? .....</b>	<b>10</b>
<b>How Do I Get More Information? .....</b>	<b>11</b>

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

## What Is This Notice About?

This notice concerns the cases *Miller v. Travel Guard Group, Inc. et al.*, No. 21-cv-09751 (U.S. District Court, Northern District of California) (the “*Miller Action*”) and *Allen v. Travel Guard Group, Inc. et al.*, No. 22-cv-06005 (U.S. District Court, Western District of Washington) (the “*Allen Action*”) (collectively, the “*Actions*”).

This settlement (the “*Settlement*”) will resolve the *Actions* against Travel Guard Group, Inc., AIG Travel, Inc., and National Union Fire Insurance Company of Pittsburgh, PA (collectively, “*Defendants*” or “*Travel Guard*”).

In the *Actions*, Plaintiffs allege that Travel Guard charges more than it is legally or fairly allowed to charge for its travel insurance plans and includes unauthorized, hidden fees as part of the total price of its travel insurance plans. Travel Guard disputes that the practice of charging a fee for non-insurance assistance services provided to travelers violates California or Washington law or that the fees or assistance services are unfair or hidden from consumers.

Travel Guard has agreed to pay \$23,997,500 to settle the claims against it in the *Actions*. The group of people who are affected by the *Settlement* is called the “*Settlement-Notice Class*.” If you are in this group and want to get paid, you must file a claim on the settlement website at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or by returning a claim form. If you are in the *Settlement-Notice Class* and do not opt out, you will be part of the *Settlement Class* and bound by the *Settlement*.

Your legal rights may be affected whether or not you act. Read this notice carefully.

This notice summarizes the proposed *Settlement*. For the precise terms and conditions of the *Settlement*, please see the *Settlement Agreement* available at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com), or contact the *Settlement Administrator* at Travel Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103 or by email [info@travelfeesettlement.com](mailto:info@travelfeesettlement.com) or by telephone at 1-888-255-2501.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

## What Are My Options?

<b>Submit a Claim Form</b>	<p>To receive a <b>Cash Payment</b> from the Settlement, <u>you must make a claim</u>.</p> <p>You can make a claim at <a href="http://www.TravelFeeSettlement.com">www.TravelFeeSettlement.com</a> or return a claim form by mail.</p> <p>Your Claim Form must be submitted online or postmarked by <b>August 13, 2024</b>.</p>
<b>Do Nothing</b>	<p>If you do nothing, you will remain in the Settlement Class and be bound by the Settlement, but you will not get any money from the Settlement. You will have no right to sue Defendants later for the Released Claims.</p>
<b>Opt Out</b>	<p>You can opt out of the Settlement Class (also known as excluding yourself) if you want to separately bring the kinds of claims against Defendants that are in these Actions. You will receive no Cash Payment from this Settlement and will be excluded from the Settlement.</p> <p>More detail on opting yourself out can be found below.</p> <p>The deadline to opt out is <b>August 13, 2024</b>.</p>
<b>File an Objection</b>	<p>If you are a member of the Settlement Class (that is, you do not opt out of the Settlement), you can write to the Court about any aspect of the Settlement you don't like.</p> <p>More detail on objecting to the Settlement can be found below.</p> <p>The deadline to object is <b>August 13, 2024</b>.</p>

The Court still has to decide whether to approve the Settlement. Cash Payments will be provided to Class Members only if the Court finally approves the Settlement. If there are appeals, these benefits will not be provided until the appeals are resolved and the Settlement becomes effective. Please be patient.

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

## What Are the Actions About?

The Actions are about the prices Travel Guard<sup>1</sup> charges for its travel insurance plans.

The California and Washington insurance departments approved particular prices for Travel Guard to sell travel insurance. Travel Guard packaged its travel insurance policies with what it contends are non-insurance assistance services, such as assistance with flight delays or cancellations, delayed or mishandled luggage, and medical emergencies, and sold the combined product for a higher price than the amount approved for the sale of travel insurance. Plaintiffs contend that such services were covered by the insurance contracts and that it was illegal and unfair for Travel Guard to add the additional fees to the approved prices for travel insurance.

A copy of Plaintiffs' complaint and amended complaint are available at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com).

Defendants deny any wrongdoing. They contend that they have complied with the law in all respects and at all times and properly informed customers of the travel insurance plan price, coverages and benefits, including the assistance services included with the Travel Guard travel insurance plans.

The Court has not determined whether Plaintiffs or Defendants are correct.

## What Has Happened in the Actions?

The Actions were brought as proposed class actions. A class action is a lawsuit in which the claims and rights of many people can be decided in a single court proceeding, rather than in many separate lawsuits. One or more people—called “plaintiffs” or “class representatives”—sue on behalf of people who made similar purchases. All of these people form a proposed “class” and are potential “class members.” When a court “certifies” a class for particular claims (which means it decides that a plaintiff shall represent a group of people for purposes of those claims), then a judgment in the class action resolves those claims for all class members, except those who choose to exclude themselves from the class.

In the *Miller* Action, the Court certified a California class for purposes of **two** of Plaintiffs' theories: (1) that Travel Guard's conduct is **unlawful** and (2) that Travel Guard's conduct is **unfair**. The Court did not certify any class for purposes of Plaintiffs' theory that Travel Guard's conduct was deceptive or fraudulent.

In the *Miller* Action, the Court also confirmed an arbitration award finding that Plaintiff Miller's claims were not subject to arbitration. Travel Guard appealed that decision. That appeal has been stayed pending this Settlement.

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<sup>1</sup> Defendants in the Actions are related entities within the AIG organization: Travel Guard Group, Inc. (“TGG”) is the insurance agent for the insurance sales at issue; AIG Travel, Inc. (“AIG Travel”) is TGG's parent; and National Union Fire Insurance Company of Pittsburgh, PA (“NUFIC”) is the insurance company for the policies at issue. Defendants are collectively referred to as “Travel Guard” in this Notice and in the Actions.

In the *Allen* Action, the Court denied Travel Guard's motion to compel arbitration. Travel Guard appealed that decision. The *Allen* Action is stayed pending Travel Guard's appeal. The appeal in the *Allen* Action has been stayed pending this Settlement.

More information about the Actions can be found through the Public Access to Court Electronic Records (PACER) system at <https://pacer.uscourts.gov>.

## Am I a Class Member?

The Settlement-Notice Class includes all Persons, except Excluded Persons, who purchased at least one Qualifying Travel Guard Plan from December 17, 2017, through and including January 18, 2024. A Travel Guard Plan qualifies for this Settlement if the purchaser (a) was charged a single plan price that included an Assistance Fee and (b) provided a billing address in the State of California or Washington or, where no billing address is identified in Travel Guard's records, the Travel Guard Plan identified the insured as having a California or Washington address.

The following Excluded Persons are not included in the Settlement-Notice Class: (a) each and every presiding District Judge and Magistrate Judge in the Actions, Judge Gandhi (Ret.), Robert A. Meyer, and their staff, and their immediate family members; (b) the officers, directors, agents, servants, and current and former employees of Defendants who were employed by Defendants at any time on or after the start of the Class Period, and the immediate family members of such Persons; and (c) any Person who received a complete refund for each and every Qualifying Travel Guard Plan purchased by that Person.

Notices were emailed or mailed to each Settlement-Notice Class Member for whom Travel Guard has contact information. Please check your email and mail to see if you received such a notice.

Most Travel Guard purchasers purchased their insurance through an Expedia website (such as Expedia.com, Travelocity.com, or Orbitz.com) or through United Airlines. However, Travel Guard also sells travel insurance through other channels, including other airlines, websites, and various travel agents, as well as directly to consumers through [www.travelguard.com](http://www.travelguard.com) and through its call center. You can check your travel insurance plan documents to see if it is a Travel Guard plan.

If you are not sure if you are a member of the Settlement-Notice Class, you may email the Settlement Administrator at [info@travelfeesettlement.com](mailto:info@travelfeesettlement.com) or call the Settlement Administrator at 1-888-255-2501.

## What Can I Get from the Settlement?

If you are a member of the Settlement-Notice Class and submit a valid Claim Form, you will receive a Cash Payment as an Authorized Claimant. Your Cash Payment will depend on the amount of the Assistance Fees included in the Qualifying Travel Guard Plans you purchased. The Assistance Fees included in Travel Guard Plans varied but are recorded in Travel Guard's records.

After payments for Notice and Administration Expenses, Taxes and Tax Expenses, Awarded Attorneys' Fees and Expenses, Incentive Awards, payments to Proposed Intervenors, and any other Court-approved deductions, the remainder of the \$23,997,500 Settlement Amount ("Net Settlement Fund") shall be

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

distributed, as Cash Payments, among all Authorized Claimants in proportion to the amount of Assistance Fees paid by each Authorized Claimant for Qualifying Travel Guard Plans, as reflected in Travel Guard's records provided to the Settlement Administrator.

You will not receive a Cash Payment for any Qualifying Travel Guard Plan you purchased if you already received a complete refund for that Qualifying Travel Guard Plan.

## How Do I Request a Cash Payment?

To request a Cash Payment, you must fill out the Claim Form available on this Settlement Website, [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com). You can submit the Claim Form online, or you can print it and mail it to the Settlement Administrator at: Travel Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. Claim Forms must be **postmarked or submitted online** to the Settlement Administrator on or before 11:59 p.m. Pacific Time on **August 13, 2024**.

Please note that a Claim Form that is not properly filled out and signed or that is not submitted or postmarked by the deadline or is determined to be fraudulent will be invalid and disregarded by the Settlement Administrator.

## When Do I Get My Cash Payment?

Timely submitting a Claim Form does not guarantee a Cash Payment. A Final Approval Hearing is scheduled for **October 1, 2024** at 2:00 p.m. PT. If the Court approves the Settlement and there are no appeals, then the Cash Payments will be distributed within 45 days after the Effective Date of the Settlement, unless otherwise ordered by the Court. If the Court does not approve the Settlement, or if the Settlement is overturned on appeal, no Cash Payments will be issued.

## What Do Plaintiffs, Proposed Intervenors, and Class Counsel Get?

The Court has appointed Gutride Safier LLP as Class Counsel for the Settlement-Notice Class. Class Counsel has experience in handling class actions.

To date, Class Counsel has not been compensated for any of their work on this case. As part of the Settlement, Class Counsel has requested that the Court approve their Attorneys' Fees and Expenses to be paid from the Settlement Fund: for reimbursement of their out-of-pocket expenses and up to 30% of the Settlement Amount in attorneys' fees.

In addition, the Plaintiffs (who brought the Actions) have requested that the Court approve Incentive Awards to them of \$5,000 each, and the Proposed Intervenors (who sought to become plaintiffs in the *Miller* Action and who provided documents and testimony to Defendants) have agreed to settle their claims against Defendants for equal amounts. These payments will compensate the Plaintiffs for the time,

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

effort, and risks they undertook in pursuing the Actions to benefit the Settlement-Notice Class, and will resolve the claims of the Proposed Intervenors.

Copies of the papers filed in support of Class Counsel's motion seeking an award for Attorneys' Fees and Expenses and for Plaintiffs' Incentive Awards are or will be available on the Settlement Website. Plaintiffs' and Class Counsel's Motion for Final Approval and Motion for Attorneys' Fees, Costs, and Class Representative Awards will be filed July 9, 2024, and then posted to the Settlement Website. The Court will determine the amount of Attorneys' Fees and Expenses, as well as the amounts of Incentive Awards, consistent with the standards for similar settlements in the Ninth Circuit based on Class Counsel's labor, risk, and the complexity of the work that was done to obtain the Settlement for the Settlement-Notice Class.

## What Happens if I Do Not Opt Out of the Settlement?

If you are a Settlement-Notice Class Member and you do not request to be excluded (that is, "opt out") from the Settlement, you will be legally bound by all orders and judgments of the Court with respect to the Settlement, and you will also be legally bound to the release of Released Claims as set forth in the Settlement Agreement. This means that in exchange for being a Settlement Class Member and being eligible for Cash Payments, you will not be able to sue, continue to sue, or be part of any other lawsuit against Travel Guard and/or any of the Released Defendants that involves similar factual allegations or legal claims as those resolved through this Settlement.

The "Released Claims," which are more fully defined in the Settlement Agreement, are any and all claims and causes of action of every nature and description, whether known or unknown, whether arising under federal, state, common, or foreign law, based in law or equity, that have been brought or that could have been brought in the Consolidated Action and each Action and that arise out of or relate to the allegations that sales of Qualifying Travel Guard Plans were unlawful, unfair, falsely advertised, or deceptive with respect to the marketing, offering, solicitation, pricing, sale, accessibility, availability, and/or payment of Assistance Fees for the assistance services included in (a) the Qualifying Travel Guard Plans or (b) any regulatory filing seeking approval for the rates and forms for Qualifying Travel Guard Plans. The Released Claims include without limitation claims under the unlawful, unfair, and fraudulent prongs of California's Unfair Competition Law ("UCL"), including UCL "unlawful" claims based on alleged violations of Cal. Ins. Code § 1861.01(c), Cal. Ins. Code § 1861.05, Cal. Ins. Code § 381, Cal. Ins. Code § 332, Cal. Ins. Code § 790.02, Cal. Code Regs. Tit. 10, §§ 2189.3 and 2189.5, or any other California insurance statute or regulation; Business and Professions Code § 17200, *et seq.*; claims under California's False Advertising Law ("FAL"), Business and Professions Code § 17500, *et seq.*; and common law fraud, deceit, or misrepresentation. The Released Claims do not include: (i) claim(s) for personal injury against Defendants or the Released Defendants; (ii) claim(s) for insurance coverage under any Travel Guard Plan or relating to Defendants' failure to properly provide insurance coverage, to properly provide particular assistance benefits in a particular case, or to comply with applicable law in administering claims for insurance coverage or benefits; (iii) claim(s) arising from the purchase of any Travel Guard Plan after January 18, 2024; or (iv) right(s) to enforce this Agreement.

**You will not be responsible for any out-of-pocket costs or attorneys' fees concerning the Actions if you stay in the Settlement Class.**

The full text of the Settlement Agreement, which includes all of the provisions about settled claims and releases, is available at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com).

## Does This Settlement Affect Insurance Claims Under Travel Guard Policies?

This Settlement does **not** involve claims about insurance coverage disputes or about the denial of insurance benefits. This Settlement relates to the Assistance Fees Travel Guard included in Qualifying Travel Guard Plans. This Settlement does **not** affect or change the insurance coverage or any insurance benefits you may be owed in connection with your previous, planned, or upcoming trips. Whether you participate in this Settlement or decide to opt out of the Settlement, you can still pursue insurance claims against Defendants under applicable law (subject to statute of limitations or any other laws that may prevent you from bringing such a claim).

## How Do I Opt Out of the Settlement?

You can opt out from the Settlement Class—that is, be excluded from the Settlement Class—if you wish to retain the right to sue Defendants separately for the Released Claims. If you opt out, you cannot obtain a Cash Payment from the Settlement. In addition, if you opt out, you cannot submit an objection to the Settlement.

Each Settlement-Notice Class Member who wishes to be excluded from the Settlement must submit to the Settlement Administrator a written statement requesting exclusion from the Settlement. Such requests for exclusion must be made by submitting the online form on the Settlement Website or by mailing a valid exclusion request by First Class U.S. Mail to the Settlement Administrator at Travel Fee Settlement Administrator, Attn: Exclusion Request, P.O. Box 58220, Philadelphia, PA 19102. To be effective, the request for exclusion must:

- a. include the Settlement-Notice Class Member's full name and address;
- b. include a statement that the Settlement-Notice Class Member wishes to be excluded from the Settlement Class in *Miller v. Travel Guard Group, Inc.*, No. 21-cv-09751 (N.D. Cal.); and
- c. be individually and personally signed by the Settlement-Notice Class Member (if the Settlement-Notice Class Member is represented by counsel, it must also be signed by such counsel).

**To be valid, the opt-out request must be postmarked or submitted online by the Exclusion/Objection Deadline, which is August 13, 2024.**

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

## How Do I Object to the Settlement?

You can ask the Court to deny approval of the Settlement by submitting a written objection to the Settlement Administrator, as set forth below. The Settlement Agreement does not provide discretion for the Court to order a different or larger Settlement; the Court can only approve or disallow the Settlement. If the Court denies approval to the entire Settlement, no Cash Payments will be sent out, and the Actions will continue. If that is what you want to happen, you must object.

Any Settlement Class Member (that is, any Settlement-Notice Class Member who does not submit a valid and timely request for exclusion) may submit an objection to the Settlement Agreement. Any Settlement Class Member who intends to object to the Settlement or the Settlement Agreement (including Class Counsel's requested Attorney's Fees and Expense application) must submit a written notice of objections by mailing them to the Settlement Administrator at Travel Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, by filing them electronically, by mailing them to the Clerk of Court, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, or by filing them in person at any location of the United States District Court for the Northern District of California. The objections must be filed or postmarked no later than **August 13, 2024**. The objections must include:

- a. the case name and number (*Miller v. Travel Guard Group, Inc. et al.*, No. 21-cv-09751 (N.D. Cal.);
- b. the objecting Settlement Class Member's full name and address;
- c. either the Claimant Identification Number included in the Email Notice or Postcard Notice directed to the objecting Settlement Class Member or documents or testimony sufficient to establish that the objector is a member of the Settlement Class;
- d. a statement of each of the Settlement Class Member's objections;
- e. the name, address, email address, and telephone number of every attorney representing the objector;
- f. a statement indicating whether the objector and/or his or her counsel intends to appear at the Final Approval Hearing.

By filing an objection, you consent to the jurisdiction of the Court, including to any order of the Court to produce documents or provide testimony prior to the Final Approval Hearing.

If you file an objection to the Settlement but still want to receive a Cash Payment in the event the Court approves the Settlement, you must still timely submit a Claim Form according to the instructions described above.

## When Will the Court Decide If the Settlement Is Approved?

Pursuant to Rule 23(e)(2) and 28 U.S.C. § 1715(d), the Court will hold a Final Approval Hearing on October 1, 2024, at 2:00 p.m. PT, in Courtroom 09, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, before Judge Trina L. Thompson, for the purpose of finally determining whether (a) this action meets each of the prerequisites for class certification set forth in Federal Rule of Civil Procedure 23(a) and may properly be maintained as a class action on behalf of the Settlement Class under Federal Rule of Civil Procedure 23(b)(3); (b) the Settlement Agreement should receive final approval as fair, reasonable, adequate, and is in the best interests of the Settlement Class in light of any objections presented by Class Members and the Parties' responses to any such objections; (c) the Court should grant final approval of the Settlement Agreement, dismissing Plaintiffs' claims, as provided in the Settlement Agreement; and (d) the request of Class Counsel for the payment of Attorney's Fees and Expenses to Class Counsel and the payment of an Incentive Award to each Plaintiff are reasonable and should be approved. The Final Approval Hearing may be postponed, adjourned, or continued by further order of this Court, without further notice to the Parties or the members of the Settlement Class other than entry of an order on the Court's docket. Class Members should consult the Settlement Website at [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or the Court's Public Access to Court Electronic Records (PACER) system at <https://pacer.uscourts.gov> or <https://ecf.cand.uscourts.gov>, or visit the office of the Clerk of Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays, to determine whether the Final Approval Hearing date has changed. The Court may conduct the hearing by Zoom or other remote technology, with the link available at <https://cand.uscourts.gov/judges/trina-l-thompson-tlt/>.

After final approval, the Settlement Amount of \$23,997,500 will be used to pay Valid Claims, Awarded Attorneys' Fees and Expenses, Incentive Awards, payments to Proposed Intervenors, Taxes and Tax Expenses, and Notice and Administration Expenses.

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

## How Do I Get More Information?

You can inspect many of the court documents connected with the Settlement on the Settlement Website. You can access unredacted versions of the motion(s) for approval and declaration(s) in support by signing the Acknowledgement and Agreement to Be Bound by the Protective Order entered in the *Miller* Action. Please contact the Settlement Administrator or Class Counsel for details. Other papers filed in the *Miller* Action are available by accessing the Court's Public Access to Court Electronic Records (PACER) system at <https://pacer.uscourts.gov> or <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

You can contact the Settlement Administrator at Travel Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA, 19103 or by email at [info@travelfeesettlement.com](mailto:info@travelfeesettlement.com) or by telephone at 1-888-255-2501.

You can also obtain additional information by contacting Class Counsel:

Seth Safier, Esq.  
GUTRIDE SAFIER LLP  
100 Pine Street, Suite 1250  
San Francisco, CA 94111  
Tel: 415-639-9090  
[seth@gutridesafier.com](mailto:seth@gutridesafier.com)  
[www.gutridesafier.com](http://www.gutridesafier.com)

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call 1-888-255-2501.

# **Exhibit F**

**Your Claim Form  
must be  
postmarked by:  
August 13, 2024**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*Miller et al. v. Travel Guard Group, Inc. et al.*, Case No. 21-cv-09751

[www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com)

**TG**

## Claim Form

There is a proposed class action settlement in the above Action. The Settlement-Notice Class includes all Persons, except Excluded Persons, who purchased at least one Qualifying Travel Guard Plan from December 17, 2017, through and including January 18, 2024. A Travel Guard Plan qualifies for this Settlement if the purchaser (a) was charged a single plan price that included an Assistance Fee and (b) provided a billing address in the State of California or Washington or, where no billing address is identified in Travel Guard's records, the Travel Guard Plan identified the insured as having a California or Washington address.

**If you are in the Settlement-Notice Class, you have the option to get a Cash Payment by submitting this Claim Form.** After payments for Notice and Administration Expenses, Taxes and Tax Expenses, Awarded Attorneys' Fees and Expenses, Incentive Awards, payments to Proposed Intervenors, and any other Court-approved deductions, the remainder of the \$23,997,500 Settlement Amount ("Net Settlement Fund") shall be distributed, as Cash Payments, among all Authorized Claimants in proportion to the amount of Assistance Fees paid by each Authorized Claimant for Qualifying Travel Guard Plans, as reflected in Travel Guard's records provided to the Settlement Administrator.

You will not receive a Cash Payment for any Qualifying Travel Guard Plan you purchased if you already received a complete refund for that Qualifying Travel Guard Plan.

**To obtain a Cash Payment from the Settlement, you are required to complete, sign, and return this Claim Form. YOUR CLAIM FORM MUST BE POSTMARKED OR SUBMITTED ONLINE TO THE SETTLEMENT ADMINISTRATOR NO LATER THAN AUGUST 13, 2024, at 11:59 p.m., Pacific Time.** You may submit this Claim Form electronically via the **Settlement Website, at [TravelFeeSettlement.com](http://TravelFeeSettlement.com)** or you may send the form by first-class mail, or the equivalent, to the address at the bottom of this form. Only Settlement-Notice Class Members or their legal representatives may submit a Claim Form. The information you provide on this Claim Form will not be disclosed to anyone other than the Court, the Settlement Administrator, and the Parties in this case, and will be used only for purposes of administering this Settlement (such as to audit and review a claim for completeness, truth, and accuracy). The Settlement Administrator will use the email address that you provide on this Claim Form to communicate with you if communication is necessary. If your email address or other contact information changes after you submit this Claim Form, please contact the Settlement Administrator at: [info@travelfeesettlement.com](mailto:info@travelfeesettlement.com).

**Please read this entire Claim Form and the Long-Form Notice before you complete and submit this Claim Form.** The Long-Form Notice, the Settlement Agreement, and other important documents and information are available on the Settlement Website at **[TravelFeeSettlement.com](http://TravelFeeSettlement.com)**. By submitting this Claim Form, you acknowledge that you have read and understand the Long-Form Notice and the Settlement Agreement. To receive the most current information and regular updates, please visit the Settlement Website at **[TravelFeeSettlement.com](http://TravelFeeSettlement.com)** or call 1-888-255-2501.

If you fail to timely submit a Claim Form, you may be precluded from receiving a Cash Payment. If you are a member of the Settlement-Notice Class and you do not timely and validly seek to exclude yourself from the Settlement, you will be bound by any judgment entered by the Court approving the Settlement regardless of whether you submit a Claim Form.



# **Exhibit G**

**Your Opt-Out  
Form must be  
postmarked by:  
August 13, 2024**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
*Miller et al. v. Travel Guard Group, Inc. et al.*,  
Case No. 21-cv-09751-TLT  
[www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com)

**TG\_OPT**

## Opt-Out Form

### I. YOUR CONTACT INFORMATION

First Name

Last Name

Street Address

City

State

Zip Code

Email address

### II. SIGNATURE

I am a Settlement-Notice Class Member who is requesting to be excluded from the Settlement in *Miller et al. v. Travel Guard Group, Inc. et al.*, Case No. 21-cv-09751-TLT (N.D. Cal.).

\_\_\_\_\_  
Your signature

Date: \_\_\_\_\_  
MM DD YYYY

**If submitted by U.S. mail, this form or any written request to opt-out must be sent to the Settlement Administrator at the address below and be postmarked by August 13, 2024.**

Travel Fee Settlement Administrator  
ATTN: Exclusion Request  
P.O. Box 58220  
Philadelphia, PA 19102

# **Exhibit H**

Exclusion #	Name	Exclusion Date
1	ADAM LANDRENEAU	5/12/2024
2	ADRIENNE JONES	6/16/2024
3	AKIKO FUJIWARA	5/13/2024
4	ALI SEVERSON TORME	5/14/2024
5	ALIAKSANDR KUZIKAU	5/16/2024
6	AMANDA DAVIS	6/8/2024
7	AMER JARIDLY	6/8/2024
8	AMERICA GONZALEZ	7/2/2024
9	AMINA ROMERO	6/6/2024
10	ANDI SCHREIBMAN	5/10/2024
11	ANDRESSA BATISTACHIABAI	6/5/2024
12	ANDY HOWARD	5/12/2024
13	ANGELA FITE	5/13/2024
14	ANITA G PALACIOS	5/8/2024
15	ANNA FELKER	6/6/2024
16	ANTHONY TRUONG	5/14/2024
17	BALAJI SHYAMKUMAR	5/11/2024
18	BARBARABATISTA CHIABAI	6/5/2024
19	BILL MASON	6/14/2024
20	BLAINE MORCH	5/13/2024
21	BRENDEN TIPPETS	6/5/2024
22	BRIAN PUN	6/7/2024
23	BRUNA ROBERTA DOS SANTOS NEPOMUCENO	6/7/2024
24	BRYAN ZADORA	6/11/2024
25	BURTON G SILVER	6/7/2024
26	CAMILLE PAGEE	5/20/2024
27	CAMILO PARRA	5/15/2024
28	CAROL KELLEY	6/3/2024
29	CAROLE LUTHER	6/11/2024
30	CARTER DAVIS	6/7/2024
31	CAYLEN CRAWFORD	6/30/2024
32	CHADAPORN DESMUL	5/12/2024
33	CHARLENE REYNOLDS	6/7/2024
34	CHARLES HODGSON	6/10/2024
35	CHERYL SHAWLEE	5/19/2024
36	CHERYL WATSON	5/15/2024
37	Chris Weike	5/13/2024
38	CHRISTIE SHAFFER	6/11/2024
39	CHRISTINA GEORGE	6/9/2024
40	CHRISTINE GONDEK	6/18/2024
41	CHRISTINE L CLARK	6/6/2024
42	CHRISTOPHER DOYLE RATLIFF	6/6/2024
43	CHRISTOPHER HOKE	5/16/2024

44	CIARA CYR	6/6/2024
45	CLIVE CUBBAGE	5/9/2024
46	CYNTHIA BLAZEK	6/5/2024
47	CYRIL OSTIGUY	6/8/2024
48	DAVID AHARONY	6/9/2024
49	DAVID ALLSHOUSE	6/12/2024
50	DAVID DAVIDSON	5/13/2024
51	DAVID FIELDING	5/13/2024
52	DAVID POTTER	5/11/2024
53	DAVID SCOGGINS	6/6/2024
54	DAVID SOLIMANO	7/2/2024
55	DAVIDE SEBASTIANO LUPICA	5/13/2024
56	DEANNA VEACH	6/4/2024
57	DENNIS SARINA	5/13/2024
58	DENNIS CALGARO	5/16/2024
59	DOUGLAS BEGHIN	5/13/2024
60	EARL HATCHER	5/10/2024
61	ELEANOR COULTER	6/12/2024
62	ELENA GURZHI	6/5/2024
63	ELIZABETH HEFFELFINGER	6/4/2024
64	EMILY DARLINGTON	6/11/2024
65	ERIC METZ	6/6/2024
66	EUGENE FREDERICK	5/14/2024
67	FRANCESCO PUZZO	6/14/2024
68	GARY ARAKELIAN	6/11/2024
69	GARY D RENZELMAN	5/26/2024
70	GAVIN SHANOFSKY	6/7/2024
71	GEORGE KARASSOULOS	6/8/2024
72	GILLIAN SULLIVAN	6/9/2024
73	GIOACCHINO FARAONE	6/5/2024
74	GORDON S BRONEY	5/7/2024
75	H JILL FIVECOAT	6/8/2024
76	HARRRY FEATHERSTONE	5/17/2024
77	HIDEKI TSUTSUMI	5/16/2024
78	HOWARD MYATT	6/10/2024
79	INGRID FARRINGTON	5/13/2024
80	ISRAEL FIGUEROA BURGOS	5/10/2024
81	ISRAEL GARCIA	5/13/2024
82	JACK BROWN	6/24/2024
83	JACK EPPERT	5/11/2024
84	JAIME TANNA	5/21/2024
85	JAMES MCNEILL	6/6/2024
86	JAMES SIBLEY	5/14/2024
87	JANET GLECKLER	6/10/2024

88	JANET LAFAVE-HALL	5/14/2024
89	JAY GOTTLIEB	6/8/2024
90	JAYCIE OILAR	5/14/2024
91	JAYNA QUERIN	5/16/2024
92	JEANNETTE MILOCH	5/8/2024
93	JEFFREY KERSHAW	5/11/2024
94	JENIFER LEIGH	6/28/2024
95	JENNIFER SOUTHWORTH	6/7/2024
96	JENNY BUI	6/8/2024
97	JERRY LIVINGSTON	6/10/2024
98	JESSICA FERRUCCI	6/13/2024
99	JILL POPE	5/17/2024
100	JOANN K ROOMES	5/16/2024
101	JOE YOUSSEF MALEK	5/15/2024
102	JOEL DAVENPORT	6/13/2024
103	JOHANNA CASTRO MONTENEGRO	5/15/2024
104	JOHANNES BERNARDUS PEPERKAMP	6/9/2024
105	JOHN JAY KOROSI	7/6/2024
106	JON PALLISTER	6/21/2024
107	JORGE MACIAS	6/14/2024
108	JOSE RIVAS MADERO	6/5/2024
109	JOYCE MORTON	6/4/2024
110	JUN SHIRAKAWA	5/11/2024
111	JUNGHUN CHEON	6/12/2024
112	JUSTIN L. MOON	5/16/2024
113	KARL JOHNSON	6/6/2024
114	KATHRYN WARTHNE	5/17/2024
115	KEVINE KEZA	5/10/2024
116	KIMBERLY MASON	5/18/2024
117	KYLE WITKOWSKI	6/12/2024
118	LATHA DOWRAY	7/2/2024
119	LAURA BERMAN FORTGANG	5/24/2024
120	LAURIE HANKINS	5/13/2024
121	LEATHA BROWN	6/21/2024
122	LEEANNE MCPHERSON	5/11/2024
123	LEONARD SUMMERS	5/18/2024
124	LINDA MERCURE	5/14/2024
125	LIONEL MARTIN	6/20/2024
126	LOREN ROBERTS	6/3/2024
127	LORENA CORRAL	6/11/2024
128	LUKE LAURIN	6/16/2024
129	LUKE MANGAN	5/13/2024
130	LYNNE LIGHTHALL	5/13/2024
131	MANISH RAMTEL	6/19/2024

132	MANSUR USMANOV	5/22/2024
133	MARCELLE CRUZ PAGAN	6/5/2024
134	MARCO ANTONIO NIETO PATARROYO	5/13/2024
135	MARIA JOHNSON	6/17/2024
136	MARIA T KOHANEK-LEDESMA	6/9/2024
137	MARILYN GALLI	5/13/2024
138	MARIO ALBERTO RIVERA	6/11/2024
139	MARSHA J DECICCO	6/8/2024
140	MARY JANE FRANCIS	6/12/2024
141	MARY LEVY	5/10/2024
142	MARY MILICEVIC	5/13/2024
143	MATTHEW BRIAN SCHICK	6/10/2024
144	MAURIZIO BONACINI	6/11/2024
145	MAY-LING HO	5/17/2024
146	MELEA SIMON	6/6/2024
147	MELODY POFF	5/15/2024
148	MELONESE COCHEE	6/8/2024
149	MEYRA CEYLAN	6/12/2024
150	MICHAEL BERTONI	6/7/2024
151	MICHAEL ELLSWORTH	5/16/2024
152	MICHAEL FAGER	5/16/2024
153	MICHELLE LOONEY	6/10/2024
154	MIGUEL ANGEL NIETO	5/12/2024
155	MIRIAM MCCLURE BARNHART	6/5/2024
156	NALITH PERERA	6/11/2024
157	NANCY ABBOTT	6/8/2024
158	NANCY JONES	5/14/2024
159	NATALIA RUIZ	6/10/2024
160	NATALIA SULISTIYO	5/11/2024
161	NICHOLAS MICHAEL KORDICK	5/10/2024
162	NICKJ VANDARAKIS	5/12/2024
163	NILOOFAR BADIE	5/22/2024
164	NOAH DREVER	6/7/2024
165	NOELLE PAGE	6/13/2024
166	NONI NEALE-SIPILI	6/7/2024
167	OLGA HUFFMAN	5/17/2024
168	OMAR ESTRADA	6/17/2024
169	PAMELA RICHARDSON	6/11/2024
170	PATRICIA ENGDAHL	6/10/2024
171	PAUL MACHLISS	6/3/2024
172	PIERRE YVES HERVE	5/14/2024
173	PRERAK TRIVEDI	5/13/2024
174	QUENTIN MARSHALL	6/8/2024
175	RAFAEL JOSE MATEO COMPRAS	5/11/2024

176	RAISSA MATA	5/14/2024
177	RAUL EDUARDO SIMO AYBAR	5/8/2024
178	RICHARD HALL	5/13/2024
179	RICHARD LEFEBVRE	6/11/2024
180	RICK MONROE	6/7/2024
181	RICKEY THOMAS	6/8/2024
182	ROBB G HUNTER	6/11/2024
183	ROBBYN KATHLEEN CELESTIN	5/13/2024
184	ROBERT PITTS JR	5/9/2024
185	ROBERTA CHAMBERLAIN	5/11/2024
186	ROBIN WALTON	6/8/2024
187	RODNEY J STAHULAK	6/8/2024
188	RON RUDOLPH	5/13/2024
189	RONALD WATERS	6/18/2024
190	ROSARIO HUNTER	5/14/2024
191	RUTH UPTON	6/16/2024
192	SABRINA JOHNSON	6/13/2024
193	SAM CONTRERAS	5/12/2024
194	SAM THAI	5/13/2024
195	SAMANTHA WILSON	6/6/2024
196	SAMUEL AYVAZIAN	6/13/2024
197	SANDRA GORDON	5/13/2024
198	SANDRA SCHIFF	6/6/2024
199	SARAH FERNANDEZ VARELA JIMENEZ	5/13/2024
200	SCOTT ELLIS	6/13/2024
201	SEAN HOLLAND	6/11/2024
202	SEAN OTOOLE	5/14/2024
203	SEN CHIAO	6/7/2024
204	SERGIO CORTEZ	6/6/2024
205	SHANTAE CHESTER	6/10/2024
206	SHARON ERWIN	5/20/2024
207	SIMONA PEARCE	5/12/2024
208	SOHAIR AWAD	6/17/2024
209	STACEY PALMER	6/7/2024
210	STACIA MILLER	5/12/2024
211	STACIE GEYER	6/9/2024
212	STEFANIE CASH	5/13/2024
213	STEFANO FRANCESCO FLORIAN GALLINI	5/8/2024
214	STEPHANIE SMITH-STRICKLAND	5/14/2024
215	STEVE BURINGTON	6/10/2024
216	STEVEN BOOTH	6/10/2024
217	STEVEN COLLINS	6/8/2024
218	STEVEN SHAMSAI	5/16/2024
219	SUEKO S BONNER	5/10/2024

220	SUSAN NEPSTAD	5/13/2024
221	SUZANNE ITURRIRIA ALEXANDER	5/13/2024
222	SYLVIA ZAMORA	6/7/2024
223	TARA CURRIER	5/13/2024
224	TERRY AMBROSE	5/15/2024
225	TERRY MEDINA	6/13/2024
226	TESSA SHARMAN	6/10/2024
227	TEST PERSON	5/6/2024
228	THOMAS COOPER	5/14/2024
229	THOMAS CURTIS	6/6/2024
230	THOMAS DASHER	5/11/2024
231	THOMAS POETZ	5/17/2024
232	TIM EICHENBERG	5/11/2024
233	TIMOTHY RIGA	6/6/2024
234	TODD MATTHEWS	5/13/2024
235	TROY POFF	5/15/2024
236	TROY RAYMOND MAYHAN	5/15/2024
237	VALERIE WALKER	5/29/2024
238	VICKI L BATCHELOR	6/12/2024
239	VINCE BALLOTTA	5/13/2024
240	VIRGINIA ANDREWS	5/22/2024
241	WALTER BONSAK	6/10/2024
242	WAYNE KARVONEN	6/12/2024
243	WILLIAM ALEXANDER	5/13/2024
244	WOLDINE MAGLOIRE	6/7/2024
245	WYATT JORGENSEN	6/16/2024
246	XAVIER ALFARO	5/12/2024
247	XIA LIU	6/4/2024
248	YANSAY SANTACRUZ	6/4/2024
249	YUKI OHARA	5/13/2024
250	YUN JEONG CHOI	5/29/2024

# **Exhibit I**

The Settlement Administrator at Travel Fee Settlement Administrator  
Attn: Exclusion Request  
P.O. Box 58220  
Philadelphia, PA 19102

May 13, 2024

**Re: Objection to the Case No. 21-cv-09751-TLT**

To Whom It May Concern:

**1. Case name and number:** Miller v. Travel Guard Group, Inc. et al., No. 21-cv-09751 (N.D. Cal.)

**2. Objecting Settlement Class Member's full name and address:**

Name: SURYA NAULI [REDACTED]

Address: [REDACTED]

**3. Claimant Identification Number:**

Class Member Identification Number: [REDACTED]

Confirmation Code: [REDACTED]

**4. Statement of Class Member's objections:**

For a \$23,997,500 Settlement, it states that "*The Settlement relates only to the price you paid for each Travel Guard Plan*". Or, it is only \$39 (see attachments). I am seeking a settlement of \$250,000, plus a full-ticket refund, and a potential attorney fee.

This settlement cannot be merely based on the "hidden fees", but it should also include Travel Guard failing to provide full refunds to its customers (see attachments). For this reason, I request in the strongest term to REJECT this settlement as it will negatively and unfairly impact all consumers (except Miller).

**5. Attorney representative:** N/A; I am still looking for an attorney who can provide fair practices.

**6. Statement of Class Member's:** As soon as I have a legal counsel, I intend to appear and appeal this settlement at the Final Approval Hearing.

Regards,

[REDACTED]  
**Surya Nauli**

cc: the United States District Court for the Northern District of California

**Notice of Class Action Settlement re Travel Guard Insurance Plans**

Travel Fee Settlement Administrator <donotreply@travelfeesettlement.com>

Sun 5/12/2024 10:35 AM

To:Nauli, Surya [REDACTED]

**External Message**

**United States District Court for the  
Northern District of California**  
  
***Miller et al. v. Travel Guard Group, Inc. et al.,***  
**Case No. 21-cv-09751-TLT**

**Class Action Settlement Notice Re:**

**Travel Guard Insurance Plans**

***Authorized by the U.S. District Court***

**YOU MAY BE ENTITLED TO BENEFITS UNDER A CLASS ACTION SETTLEMENT RELATING TO ASSISTANCE  
FEES INCLUDED IN TRAVEL GUARD PLANS.**

**Class Member Identification Number:** [REDACTED]

**Confirmation Code:** [REDACTED]

**SURYA NAULI**

- This class action settlement will affect your rights even if you do not claim your benefits.
- Travel Guard has agreed to pay a total Settlement Amount of \$23,997,500, from which Cash Payments may be made to affected Settlement Class Members.
- To receive a Cash Payment, you must submit a Claim Form by August 13, 2024.
- You have the right to exclude yourself from the Settlement, but must do so by August 13, 2024.
- In these Actions, Plaintiffs allege that Travel Guard charges more than it is legally or fairly allowed to charge for its travel insurance plans. Travel Guard disputes Plaintiffs' allegations.
- The Settlement relates only to the price you paid for each Travel Guard Plan. The Settlement will not change your insurance coverages or your claims for benefits.

**Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) to learn about the Settlement, your options, and important dates.**

A federal court authorized this notice; it is not a solicitation from a lawyer.

Questions? Visit [www.TravelFeeSettlement.com](http://www.TravelFeeSettlement.com) or call toll-free 1-888-255-2501 or email [info@TravelFeeSettlement.com](mailto:info@TravelFeeSettlement.com).

**[Unsubscribe](#)**

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## Washington

Apr 1, 2020 - Apr 3, 2020 | Itinerary # 7513670320536

### Important Information

- Remember to bring your itinerary and government-issued photo ID for airport check-in and security.

### Orange County (SNA) → Washington (DCA)

Apr 1, 2020 - Apr 3, 2020 , 1 round trip ticket

TICKETING IN PROGRESS

American Airlines FZGEQF

Ticketing in progress. The airline will confirm most tickets within 5 minutes, but some ticket types take up to 24 hours. You do not need to call us to reconfirm your booking. Check back to ensure your ticket has been issued.

### Price Summary

Traveler 1: Adult	\$538.40
Flight	\$457.67
Taxes & Fees	\$80.73
Cancellation Plan	\$39.00

**Total: \$577.40**

All prices quoted in US dollars.

### Traveler Information

<b>SURYA NAULI</b> Adult	No frequent flyer details provided	Ticketing in progress
-----------------------------	------------------------------------	-----------------------

\* Seat assignments, special meals, frequent flyer point awards and special assistance requests should be confirmed directly with the airline.

Apr 1, 2020 - Departure 1 stop Total travel time: 7 h 7 m

### Additional Flight Services

- The airline may charge additional fees for checked baggage or other optional services.
  - Additional fees for your flight to Washington
  - Additional fees for your flight to Orange County

### Web Fare

Orange County	Chicago	4 h 4 m
SNA 7:00am	ORD 1:04pm	1,726 mi
American Airlines 2590		
Economy / Coach (Q)   MAIN   Seat 13F   Confirm or change seats with the airline*		
		Layover: 1 h 13 m

### Web Fare

Chicago	Washington	1 h 50 m
ORD 2:17pm	DCA 5:07pm	612 mi
American Airlines 999		
Economy / Coach (Q)   MAIN   Seat 10A   Confirm or change seats with the airline*		


Apr 3, 2020 - Return 1 stop

Total travel time: 7 h 49 m

**Web Fare**

Washington	Dallas	3 h 34 m
		1,192 mi
 DCA 5:20am	DFW 7:54am	
American Airlines 2866		
Economy / Coach (L)   MAIN   Seat 13A   Confirm or change seats with the airline*		
		Layover: 0 h 51 m

**Web Fare**

Dallas	Orange County	3 h 24 m
		1,205 mi
 DFW 8:45am	SNA 10:09am	
American Airlines 2402		
Economy / Coach (L)   MAIN   Seat 10A   Confirm or change seats with the airline*		

**Airline Rules & Regulations**

- Fares are not guaranteed until ticketed.
- We understand that sometimes plans change. We do not charge a cancel or change fee. When the airline charges such fees in accordance with its own policies, the cost will be passed on to you.
- Tickets are nonrefundable, nontransferable and name changes are not allowed.
- Please read the complete penalty rules for changes and cancellations applicable to this fare.
- View the complete terms and conditions in the Description of Coverage.
- Please read important information regarding airline liability limitations .

**Cancellation Plan**

**PURCHASED**

Apr 1, 2020 - Apr 3, 2020

You have purchased the Cancellation Plan. Please refer to your itinerary number when calling to ask questions or file a claim.

**Price Summary**

Cancellation Plan \$39.00

**Total: \$39.00**

All prices quoted in US dollars.

Need help with your reservation?

- **Visit our** Customer Support **page.**
- **Call Travelocity customer care at 1-855-201-7820**
- **For faster service, mention itinerary #7513670320536**

## Your Travel Insurance Policy | Important details.

Travelocity.com <email@e.travelocity.com>

Wed 1/15/2020 1:33 PM

To: Nauli, Surya [REDACTED]

External Message

## Cancellation Plan

Apr 1, 2020 - Apr 3, 2020

Washington

(Itinerary #7513670320536)

Hi Surya,

Thanks for purchasing flight protection for your booking. Your policy is provided by Travel Guard Group, Inc., Travelocity's insurance partner. Just mention your policy number or itinerary number if you need to contact us with a question.

Need to review your insurance policy?  
[View policy details \\*](#)

Need to start a claim?  
[File claim online](#)

Looking for your trip details?  
[View itinerary](#)

We wish you a safe and pleasant journey.

Team Travelocity

*\*Important:* Your policy information is accessible at this link only within a year after your travel return date.

Please do not reply to this message. This email was sent from a notification-only email address that cannot accept incoming email.

You are receiving this transactional email based on a recent booking or account-related update on Travelocity.com.

**NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.**

**Re: American Airlines Refunds**

Nauli, Surya <nauli@chapman.edu>

Thu 6/1/2023 10:46 AM

To: Refunds <refunds@aa.com>

Bcc: Nauli [REDACTED]

Hello:

We were on the phone with your agent to get the refund within a month after the flight cancellation; we were told that it was not refundable due to no-flying during Covid pandemic. In addition, your website for refund was not available until the Congress mandated your company to have one.

I should also add that I purchased the cancellation insurance with this refundable ticket. Per your own policy, *"If you bought a refundable ticket, decide not to travel and want a refund, we'll pay: The full amount of the ticket if travel hasn't started."* The travel has never started, because American Airlines cancelled the flight.

Thank you for your reconsideration.

Surya

---

**From:** Refunds <refunds@aa.com>  
**Sent:** Thursday, June 1, 2023 10:00 AM  
**To:** Nauli, Surya [REDACTED]  
**Subject:** American Airlines Refunds

External Message

**American Airlines** 

Dear SURYA NAULI :

Reference Ticket: 0017491894698

Thank you for contacting the Passenger Refunds Department.

We're sorry, but we're unable to review your request for a refund as your ticket has expired. Refund requests must be submitted while your ticket is still valid. As your ticket is expired, it holds no remaining value. For unused tickets, travel must start within a year of when it was issued. For partially used tickets, travel must be completed within one year of the first completed flight. Please visit our [Conditions of carriage](#) page for more information about ticket validity.

Sincerely,

American Airlines Passenger Refunds

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U.S. POSTAGE PAID  
FCM LG ENV  
MAY 13, 2024

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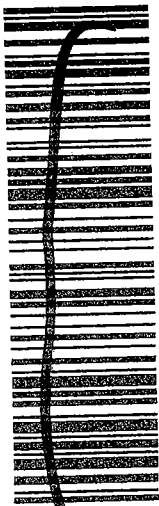
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RDC 99

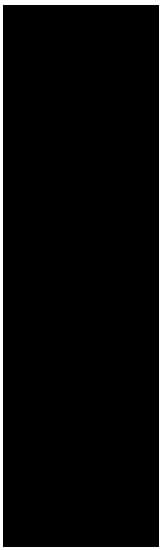


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S NAULI

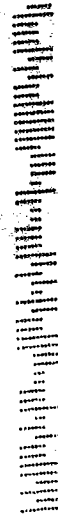


*The Settlement Administrator  
Attn: Exclusion Request  
P.O. Box 58220  
Philadelphia, PA 19102*

Received Mail  
Mingel Group

MAY 22 2024

RECEIVED



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

Miller et al.  
Class Action Members,

*Plaintiffs,*

v.

Travel Guard Group, Inc. et al.,

*Defendant.*

Case No. 21-cv-09751-TLT

**Objection by class action member**

As a Class Action Member, I would like to file an objection against settlement.

I am Class Action Member no. [REDACTED], Michał J. Gajda. I have over ten emails notifying me of purchase of Travel Guard insurance, two directly from the company, others from either Orbitz and Expedia.

The settlement covers cash payment that may cover relatively small amount of money per Settlement Class Member, thereby ceasing action against company with minuscule financial compensation for those covered by the class action.

I object to this settlement, since it does not remedy the cause of the lawsuit.

To remedy the cause of the lawsuit, TravelGuard would have to receive an injunction against impermissible actions thus preventing the company from using such a practice in the future.

I also object that closing the case with only settlement and without an opinion of the court will not record a necessary legal precedent. Such a legal precedent would in future preventing both TravelGuard and other competing companies from using such an impermissible trade practice.

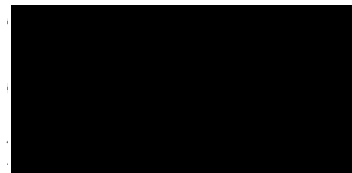
So the harm can be considered not due to amount owed, but due to unfair procedure that would likely repeat in absence of an opinion of the court.

Because of both of these reasons, I believe that it is, to the benefit of both the Settlement Class Action Members, the fair market (as a public good), and perhaps surprisingly the Defendant that this matter would be decided by a clear opinion of the honourable court. CAM would hope that such a clear court opinion would prevent not only future impermissible action not only on the part of the Defendant, but also on the part of the other competing companies.

Date: June 23, 2024

Respectfully Submitted,

Michał J. Gajda



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USPS CERTIFIED MAIL™



9214 8901 3247 3400 2044 2564 02

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1\*\*\*\*\*SNGLP 480

Travel Fee Settlement Administrator  
Attn: Exclusion Request  
PO Box 58220  
Philadelphia, PA 19102-8220

**SIGNATURE REQUIRED PER DMM 3.1.1**



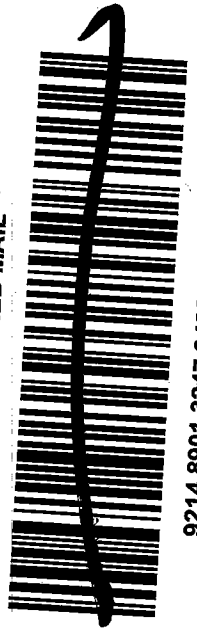
**CERTIFIED MAIL**

POSTAGE  
C

**\$7.40 0**  
US POSTAGE  
FIRST-CLASS  
062S0014850517  
FROM 22407



USPS CERTIFIED MAIL™



9214 8901 3247 3400 2044 2564 02

SIGNATURE REQUIRED PER DMM 3.1.1

1\*\*\*\*\*SINGLP 480

Travel Fee Settlement Administrator  
Attn: Exclusion Request  
PO Box 58220  
Philadelphia, PA 19102-8220



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JUL 2 2024

Angelon  
Received Mail

